

POLICIES AND PROCEDURES

*Related to Membership
in the ATS Commission on Accrediting*

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Introduction

This document contains policies and procedures adopted by the Commission membership, as described in the Commission *Bylaws*, Section 2.3. Like the Standards of Accreditation (“Standards”), they are considered incumbent upon all member schools, as noted in ATS Commission Standard 2, section 2.1, “Schools accredited by the Board of Commissioners shall carry out their educational programs and institutional activities according to the Standards and *Procedures* established by the Commission and its Board of Commissioners”

The shortened name, “Standards and *Procedures*,” refers to the three documents of the Standards of Accreditation (*General Institutional Standards*, *Education Standard*, and *Degree Program Standards*) and the Commission *Policies and Procedures*.

I Membership

- I.A Membership in the Commission on Accrediting of the Association of Theological Schools (“Commission”) is limited to schools that meet the membership eligibility criteria of The Association of Theological Schools in the United States and Canada (ATS) and that are either Full Members of ATS or Associate Members of ATS on whom the Board of Commissioners has conferred Candidate for Accredited Member status. In addition, a school that has ceased to be a member of ATS solely as a result of a Termination for Cause may continue as a member of the Commission.
- I.B Each school shall hold either Accredited Member status or Candidate for Accredited Member status by the Commission on Accrediting.

II Candidate for Accredited Member status

II.A Candidate for Accredited Member status is conferred on those members of ATS that, after review on the basis of the Commission's Standards and *Procedures*, have been formally authorized by vote of the Board of Commissioners to begin the self-study process. Candidate for Accredited Member status is granted for a period of two years. By special action of the Board of Commissioners, candidacy may be extended for one year at a time, but in no case may candidacy extend beyond a total of five years.

II.B Criteria for Candidate for Accredited Member status

II.B.1 The applying institution shall be able to demonstrate that either it is or, by the conclusion of the self-study process, will be operating according to the Commission's *General Institutional Standards, Educational Standard, and Degree Program Standards* and that it has the institutional capacity to evaluate its institutional and educational effectiveness.

II.B.2 The applying institution shall demonstrate that it has the resources and capacity to complete a self-study process and report satisfactorily within the normal two-year period.

II.C Attaining Candidate for Accredited Member status by Associate Members of ATS

II.C.1 The chief administrative officer of an Associate Member school desiring candidacy should notify the ATS Commission staff in writing that the school intends to petition the Board of Commissioners for Candidate for Accredited Member status.

II.C.2 The applicant school shall undertake an internal study of its readiness for Candidate for Accredited Member status. The Board of Commissioners will provide guidance for this internal study.

II.C.3 Upon the school's completion of its internal study, an ATS Commission staff member will review the study, conduct a staff visit to the school, and prepare a report regarding the school's capacity to meet the *General Institutional Standards, Educational Standard, and Degree Program Standards*.

II.C.4 The Board of Commissioners will base its decision regarding candidacy on the institution's internal study report, on the report of the staff visit, and on its assessment of the extent to which the institution will be able to meet the Commission's Standards of Accreditation by the conclusion of the candidacy period. The Board of Commissioners may do one of the following:

II.C.4.a grant candidacy for a period of two years; or

II.C.4.b deny the candidacy petition.

If it denies the request for candidacy, the Board of Commissioners shall provide reasons for its action and notify the school of additional responses required to qualify for candidacy.

II.D Maintaining Candidate for Accredited Member status

II.D.1 The institution shall demonstrate evidence of progress in the self-study process.

II.D.2 The institution shall continue to meet criteria for candidacy and conduct its degree programs in conformity with the Commission's *Degree Program Standards*.

II.D.3. The institution shall complete the Commission's Annual Report Forms.

II.D.4 The institution shall pay annual dues as prescribed by ATS and the Commission.

II.E Withdrawal from candidacy

A school may, on its own initiative, withdraw as a member of the Commission as a Candidate for Accredited Member status at any time during its term of candidacy, by written notice to the Board of Commissioners.

III Accredited Member status

III.A Accredited Members are institutions in the United States and Canada that are Associate Members of ATS that, after review on the basis of the Commission Standards of Accreditation, are granted accreditation by the Board of Commissioners and become Full Members of ATS.

III.B Criteria for Accredited Member status

III.B.1 Accredited institutions shall demonstrate that they operate according to the Commission's *General Institutional Standards*.

III.B.2 All graduate degree programs offered by Accredited Members of the Commission shall meet the *Educational Standard* and *Degree Program Standards* and be approved by the Board of Commissioners.

III.B.3 All extension education offerings that provide graduate credit toward approved degrees shall be approved by the Board of Commissioners.

III.B.4 Accredited Members must have a defined accreditable entity that offers postbaccalaureate theological degree programs, not baccalaureate degree programs.

III.C Attaining Accredited Member status

III.C.1 Candidates for Accredited Member status shall engage in the self-study process, following the guidance provided in the Board of Commissioners' *Self-Study Handbook*. On-site staff consultation is available to schools in the self-study process. The *General Institutional Standards*, *Educational Standard*, and appropriate Degree Program Standard(s) must be addressed in the self-study report.

III.C.2 The Board of Commissioners will examine the self-study report and determine whether it provides a sufficient basis for an on-site evaluation committee visit. If the Board of Commissioners approves the self-study report and authorizes an initial accreditation visit, an evaluation committee will be appointed. If the Board of Commissioners finds the self-study report inadequate, an evaluation committee visit will not be authorized, but staff will be instructed to work with the institution to make the changes necessary to permit future consideration.

III.C.3 The evaluation committee will conduct a two-to-three-day visit to the campus and prepare a written report evaluating the institution in the light of Commission Standards, following the procedures for evaluation

committees published in the Board of Commissioners' *Self-Study Handbook*.

- III.C.4 Based on the committee report and its recommendations, the Board of Commissioners may act in one of two ways:
- III.C.4.a accredit the institution and approve its degree programs for a period of no longer than seven years; or
 - III.C.4.b deny accreditation to the institution. In this event, specific reasons will be stated in writing to the school. A school denied initial accreditation has these four options: (1) appeal the decision, following the guidelines in Section XI below; (2) petition for an extension of candidacy, if the time limit has not expired; (3) request continuation of Associate Member status, with the understanding that the school will seek Candidate for Accredited Member status again within two years; or (4) voluntarily withdraw from the Commission and the Association.
- III.C.5 It is possible for schools that offer graduate, professional theological degrees and that are demonstrably engaged in educating professional leadership for communities of the Christian and Jewish faiths but that are not individually eligible for accredited membership to qualify for accreditation by virtue of resources available through membership in a cluster or by contractual arrangement with another accredited institution. Accreditation requires assessment of the strength of the individual institution, the availability and actual use of resources claimed, and adequacy of the cluster of which the school is a part. Listings in publications, both of the Commission and of the school, shall state explicitly that such an institution is "accredited by The Commission on Accrediting of the Association of Theological Schools by virtue of affiliation with _____."

III.D Maintaining Accredited Member status

- III.D.1 The institution shall maintain the Standards defined by the Commission and abide by the *Procedures* of ATS and the Commission.
- III.D.2 The institution shall complete the Commission's Annual Report Forms.
- III.D.3 The institution shall pay annual dues as prescribed by ATS and the Commission.

- III.D.4 The institution shall, at intervals specified by the Board of Commissioners, complete a process of comprehensive institutional self-study and prepare for regular scheduled visits of evaluation committees.

III.E Policy regarding teach-out plans

A member school must submit a teach-out plan to the Board of Commissioners for the Board's approval upon the occurrence of any of the following events:

- III.E.1 if the Board of Commissioners withdraws, terminates, or suspends the accreditation of the institution;
- III.E.2 if the institution notifies the Board of Commissioners that it intends to cease operations entirely or close a location that provides 100 percent of at least one program;
- III.E.3 if the US Department of Education notifies the Board of Commissioners of an action against the institution to limit, suspend, or terminate an institution's participation in any Title IV program or initiates an emergency action against the institution; or
- III.E.4 if a state licensing or authorizing agency notifies the Board of Commissioners that an institution's license or legal authorization to provide an educational program has been or will be revoked.

IV. Withdrawal from Membership

A school may, on its own initiative and by written notice to the Board of Commissioners, withdraw from membership and Accredited Member status.

V Procedures Related to Degree Program Approval

- V.A New degree programs shall not be announced without prior approval by the Board of Commissioners.
- V.B A school considering the introduction of a new degree program shall notify ATS Commission staff and seek consultative guidance. It shall then submit a petition for consideration by the Board of Commissioners. The petition shall follow the guidelines established by the Board of Commissioners, including (1) an evaluation of the appropriateness of the proposed degree in the light of the institution's mission and purpose; (2) a detailed description of the design of the proposed degree (program features, compliance with the Standards, resources available, relation to other degrees, etc.); (3) the institution's assessment of the new degree's impact on the programs already offered; and (4) an analysis of the financial support for the new degree and its impact on the institutional budget.
- V.C If the proposed degree program is at the master's level, approval by the Board of Commissioners may be granted on the basis of the written petition. If the proposed degree is at the doctoral level, approval will be considered only after a focused evaluation visit has been conducted. The Board may excuse a school from this requirement if the institution already offers an approved doctoral program in the same degree category.
- V.D When a member school determines to terminate an approved degree program, it shall notify in advance the Board of Commissioners and indicate how the school proposes to make adequate provision for current students pursuing the degree program to complete their studies and earn the degree or an equivalent degree. If the termination of the degree program also entails the closing of an entire site approved to offer that complete degree, then the school shall petition for permission to close that site and submit a teach-out plan.

VI Procedures for Approval of Extension Education (Multiple Locations or Extension Sites) and Distance Education

VI.A Institutions shall seek appropriate Board of Commissioners' action for all programs involving multiple locations (extension sites) and distance education. The procedures for review and approval of such programs vary with the type of program. The Board of Commissioners has developed guidelines that outline in detail the review and approval process for different types of extension sites and for distance education programs.

VI.B Domestic sites

- VI.B.1 **Branch campuses.** A branch campus is geographically apart and independent of the main campus of the institution as evidenced by permanence in nature, offering courses in educational programs leading to degrees, having its own faculty and administrative or supervisory organization, and having its own budgetary and hiring authority. The establishment of a branch campus requires consultation and a written petition to the Board of Commissioners identifying the educational programs to be offered and the financial, operational, management, and physical resources necessary to meet Commission Standards. A site evaluation is required within six months of the beginning of the branch campus.
- VI.B.2 **Complete degree sites.** The offering of a full degree program at a site away from the institution's primary location requires consultation, a written petition to and approval by the Board of Commissioners, and a site evaluation within six months of the site beginning to offer as much as 50 percent of the course work necessary for a full degree.
- VI.B.3 **Ongoing course offering sites.** The establishment of a program at a site away from the institution's primary location where a school intends to offer a variety of courses over time requires the submission of a written petition to the Board of Commissioners and action on the petition prior to the first offering of courses. Sites where courses are offered on an ongoing basis may be visited and evaluated as part of the Board of Commissioners' review cycle. If as much as half of the course work required for any approved degree may be completed at the site away from the school's primary location, a site evaluation shall be conducted within six months of the site beginning to offer as much as 50 percent of the course work necessary for a degree. Pursuant to Board policy, a school may be excused from an initial site visit.

VI.B.4 *Occasional course offering sites.* The establishment of a program in which a school intends to offer courses at a site away from the institution's primary location less frequently than on an annual basis does not require notification of or approval by the Board of Commissioners. The Board of Commissioners requests that institutions report such occasional offerings on the Commission's Annual Report Forms.

VI.C International sites

VI.C.1 *Outside Canada and the United States.* Institutions seeking to implement programs outside Canada and the United States that involve either the ongoing offering of courses or a full degree program must have the prior approval of the Board of Commissioners. In its proposal, the school shall clearly give attention to the guidelines adopted by the Board of Commissioners. After its review of the written proposal, the Board of Commissioners will ordinarily require a site review before it considers granting approval for these types of programs. The offering of occasional courses does not require notification of or approval by the Board of Commissioners. The Board of Commissioners expects that institutions report such occasional offerings on the Commission's Annual Report Forms.

VI.C.2 *Across the Canadian/US Border.* Institutions seeking to offer a program across the Canadian/United States border that involves either the ongoing offering of courses or a full degree program must have the prior approval of the Board of Commissioners. In its proposal, the school shall clearly demonstrate that it has given appropriate attention to the guidelines adopted by the Board of Commissioners and that it has consulted with Commission member schools near the location where the program is to be offered. The offering of occasional courses does not require notification of or approval by the Board of Commissioners. The Board of Commissioners requests that institutions report such occasional offerings on the Commission's Annual Report Forms.

VI.D Distance education

VI.D.1 When as many as six of the courses offered in any approved degree may be taken through distance education, it will be considered comprehensive distance education, and the institution must petition the Board of Commissioners for approval, according to guidelines adopted by the Board of Commissioners.

- VI.D.2 The school shall undertake a comprehensive evaluation of its distance education offerings, either as part of its institutional self-study or at another time by request of the Board of Commissioners.
- VI.D.3 In its consideration of approval of distance learning, the Board of Commissioners may require a site evaluation.
- VI.D.4 Schools conducting distance education must have a process by which the institution establishes by use of secure login and pass code, proctored examinations, or other means that are effective in verifying student identity and protecting student privacy, that the student who registers in a distance education course is the same student who participates in and completes the course and receives the academic credit. In addition, the school must notify students of any projected additional student charges associated with the verification of student identity at the time of registration or enrollment.

VII Enforcement of Standards for Accredited Members

VII.A Through comprehensive evaluation visits

- VII.A1 Comprehensive evaluations occur prior to the expiration of a grant of accreditation. Normally, a comprehensive evaluation committee visit will occur within six months of the expiration of a grant of accreditation. The grant of initial accreditation is limited to no more than seven years and reaffirmation to no more than 10 years. The Board of Commissioners may grant accreditation for shorter periods of time, with reasons given for the action in each case. Because accreditation is an ongoing relationship between the Board of Commissioners and the school, the Board of Commissioners may authorize a comprehensive evaluation at any time when regular monitoring activities indicate significant problems at multiple levels of a school or an institution initiates multiple substantive changes. The preparation of a self-study is not required when the Board of Commissioners authorizes such a special comprehensive evaluation visit, though the institution must still provide evidence that it is operating in conformity to the Standards of Accreditation.
- VII.A.2 Institutions shall engage in an institutional self-study in preparation for each comprehensive evaluation. The self-study shall follow the guidance provided in the *Self-Study Handbook*.
- VII.A.3 The self-study report shall be submitted, at least 60 days before the scheduled visit, to the ATS Commission staff who, in consultation with the chairperson of the evaluation committee, will determine whether the document is an adequate basis for conducting the visit or whether the visit should be postponed. If the visit is postponed by ATS Commission staff for more than one semester, the institution shall have the right of appeal at the next scheduled meeting of the Board of Commissioners.
- VII.A.4 In preparation for an evaluation visit, a school shall advertise to its constituencies at least 60 days prior to the visit that it is receiving an evaluation committee and invite comment in writing to the school and/or to the Commission concerning the institution's qualifications for accreditation. These comments will be available to the evaluation committee. The evaluation committee may also include an open hearing scheduled during the course of the visit.

VII.A.5 The Board of Commissioners will publish the names of schools receiving a comprehensive evaluation visit in a given year and request comment from other Commission member institutions.

VII.B Through focused evaluation visits

VII.B.1 Focused evaluation visits may be authorized by the Board of Commissioners as a response to any of the following:

VII.B.1.a a school's invitation to the Board of Commissioners;

VII.B.1.b a school's decision to offer a new degree program, as noted in Section V of these *Policies and Procedures*;

VII.B.1.c a school's decision to offer 50 percent or more of the courses for an approved degree at a new location;

VII.B.1.d a change in ownership or substantive change in the pattern of control of the institution;

VII.B.1.e the receipt of other information that leads the Board of Commissioners to conclude that a focused evaluation visit is advisable;

VII.B.1.f an indication that the quality of a school's programs may have been adversely affected by changes in circumstances; or

VII.B.1.g in the context of investigating a formal complaint against the institution when deemed appropriate.

VII.B.2 The Board of Commissioners will require a focused visit whenever it deems that a report will not adequately address the Board's need for additional information of a substantive nature or not adequately address the school's ability to improve significantly in a particular area. When a focused visit is required, the Board of Commissioners may still require the school to submit a written report, identifying the key issue(s) to be addressed, and direct that the school's report be provided to the focused evaluation committee at least 30 days in advance of the visit. In addition, ATS Commission staff will supply the school and the committee a prospectus, describing the key issue(s), the nature of the visit, and any other documents the committee might need.

VII.B.3 In preparation for focused evaluation visits, the Board of Commissioners may require reports from the school as are appropriate to the situation,

authorize staff or other evaluators as appropriate, and provide instruction for the school and the evaluators regarding the committee's report to the Board of Commissioners. The expectations for a focused evaluation will be described to the school in the context of a written prospectus prepared for the visit.

VII.C Through approval of substantive changes

- VII.C.1 Substantive changes that require petitioning for Board approval include the following:
- VII.C.1.a change in an institution's fundamental mission, legal status, ownership, name, location, or governing control;
 - VII.C.1.b change in location(s) at which an institution offers at least 50 percent of an educational program (see Section VI above);
 - VII.C.1.c introduction of six or more distance learning courses (see Section VI above);
 - VII.C.1.d the offering of a new degree program (see Section V above);
 - VII.C.1.e a change in type of educational units (e.g., a change from clock hours to credit hours);
 - VII.C.1.f 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, for Title IV participants, any contract for educational offerings with an entity not eligible to participate in Title IV programs);
 - VII.C.1.g the acquisition of any other institution or any program or location of another institution; and
 - VII.C.1.h 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.
- VII.C.2 It is the responsibility of an accredited school to petition the Board of Commissioners for approval of these changes prior to implementing them.

- VII.C.3 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.
- VII.C.3.a 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).
- VII.C.3.b Changes that require notification to and acknowledgement by ATS Commission staff include (1) 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).
- VII.C.3.c 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.
- VII.C.4 Substantive changes do not include exceptions that an institution may choose to make for an individual student.

VII.D Through the use of reports

- VII.D.1 The Board of Commissioners may require a report if it judges that an accredited institution should supply additional information or needs to improve in an area or areas. In its action to require such a report, the Board will identify the Standards where it needs information or judges that the institution requires improvement, and it will set the submission date or dates according to its judgment of the time reasonably necessary to provide the information or to make the improvement.
- VII.D.2 The circumstances meriting reports are not instances of noncompliance, and insufficient improvement does not signal noncompliance.

VII.E Through the use of notations

- VII.E.1 On the basis of reports received either from an evaluation committee or from a member institution, the Board of Commissioners shall impose a notation or notations when it judges that an institution insufficiently meets one or more Standards of Accreditation or that principles contained in the Standards are not being adequately translated into practice. The Board views a notation as a notice or warning that a school partially meets a Commission Standard, but it does not fully meet the Standard until appropriate action is taken in a timely manner.
- VII.E.2 A notation is a public characterization of membership status. The *Membership List* includes any notations imposed by the Board of Commissioners as part of the institution's formal Accredited Member status.
- VII.E.3 Within two years following the imposition of a notation, the Board of Commissioners will consider evidence as to why the notation should be removed. The school must submit that evidence at least two months prior to the meeting in which the Board of Commissioners will act, as specified in the Board's action letter that imposes the notation. If the institution does not provide the requisite evidence, the Board of Commissioners shall take an adverse action. In certain cases and for demonstrated good cause, the Board of Commissioners may extend by one year the period of imposition of a notation.

VII.F Through the use of probation

- VII.F.1 Probation is designed to respond to the circumstance in which an institution does not meet one or more of the *General Institutional Standards*, *Educational Standard*, or *Degree Program Standards*.
- VII.F.2 No institution will be placed on probation without an on-site visit. The evaluation committee will prepare a written report and submit it to the institution for its response. The evaluation committee's report and the institution's response will be considered by the Board of Commissioners and will serve as the basis for the decision of the Board of Commissioners.
- VII.F.3 In any action imposing probation, the Board of Commissioners will identify the Standards that it judges that the institution is no longer meeting and describe its expectations regarding changes necessary to correct the situation.

- VII.F.4 The time assigned to an institution for the remedial action required for the removal of probation will be not less than 12 nor more than 24 months. If an institution demonstrates that the conditions to remove probation have been met prior to the deadline, the institution may petition the Board of Commissioners for an early decision on the request to remove probation.
- VII.F.5 Prior to the end of the period of probation, a visit by an evaluation committee will be conducted to bring a report to the Board of Commissioners with a recommendation as to whether the Board of Commissioners should remove probation or take an adverse action. In certain cases and for demonstrated good cause, the Board of Commissioners may extend by one year the period an institution has to demonstrate that the conditions to remove probation have been met.
- VII.F.6 When probation is imposed upon an institution, the action of the Board of Commissioners will be communicated in the *Membership List* and in the Board of Commissioners' reports provided by the Board's policies. The institution will continue to appear in the list of accredited institutions, but following its name will appear the note, "Probation (date) to (date)."

VII.G Through withdrawal of accreditation

- VII.G.1 Notations and probation are not sequential actions.
- VII.G.2 If, at the end of the term of a notation and any extension for good cause, an institution does not demonstrate that it has remedied the problem identified by the notation, the Board shall withdraw accreditation.
- VII.G.3 If, after a period of probation (including any extension for good cause), an on-site visit, examination of the evaluation committee's report, and receipt of an institution's response, the Board of Commissioners determines that an institution has failed to demonstrate that it can or will function according to the Standards of Accreditation, the Board of Commissioners shall withdraw institutional accreditation.
- VII.G.4 Once accreditation is withdrawn, an institution may not apply for reaccreditation for a period of three years. Application will follow the procedures outlined in Section III above.

VII.H Adverse accrediting actions

Adverse accrediting actions by the Board of Commissioners are defined as denial of accreditation or withdrawal of accreditation.

VII.I Letter of Concern and Show Cause Order

- VII.I.1 The Board of Commissioners may issue a nonpublic Letter of Concern prior to imposing a public notation if it determines that an institution, though still meeting the Standards, has not responded appropriately to concerns it has raised or if it sees issues arising that need the institution's immediate and serious attention. The Letter of Concern will specify the exact nature of the concern(s) or issue(s), including instructions regarding any interactions expected with the Board (e.g., any report[s] to be submitted or any visit[s] to be scheduled, as well as a timetable for any such interactions).
- VII.I.2 The Board of Commissioners may issue a Show Cause Order prior to imposing probation or prior to withdrawing accreditation, though it is under no obligation to do so. A Show Cause Order provides an opportunity for an institution to demonstrate to the Board beforehand why probation should not be imposed or why accreditation should not be withdrawn. A Show Cause Order is normally reserved for situations of a very serious nature that come unexpectedly to the Board's attention and indicate that the school may not be meeting one or more Standards of Accreditation. The Show Cause Order will specify the time frame in which the institution must respond (not to exceed six months), the reason(s) for the Board's action, and any required action(s), such as site visits or written reports. The Show Cause Order may be public or private, at the Board's discretion.

VIII The Board of Commissioners

VIII.A Composition and duties

- VIII.A.1 The composition and duties of the Board of Commissioners are defined by the *Bylaws* of the Commission on Accrediting of the Association of Theological Schools.
- VIII.A.2 The primary duties of the Board of Commissioners include (1) the oversight of the corporate work of the Commission, as authorized by the *Bylaws*; (2) the compilation and maintenance of the list of schools accredited in accordance with the Standards determined by the Commission, including the authority to add schools to or delete them from the list; (3) the undertaking, on an ongoing basis, of a review of accredited schools for continued inclusion on the list of Accredited Member schools, including all aspects of Commission accreditation pursuant to the Standards and *Procedures* of the Commission; and (4) the regular and continuous review of the Standards of Accreditation and bringing recommendations for changes to Commission member schools.
- VIII.A.3 In the context of its duties to make decisions regarding accreditation, the Board of Commissioners is responsible for adopting and overseeing policies and procedures that ensure thorough and fair evaluation of schools and for consistently applying the Commission's *Policies and Procedures* and Standards of Accreditation.

VIII.B Procedures

- VIII.B.1 Members of the Board of Commissioners must absent themselves from discussion and voting on matters having to do with schools in which they are currently or have been previously employed and schools that they have attended as students.
- VIII.B.2 In making decisions following evaluation committee visits, the Board of Commissioners will consider the self-study of the school under consideration, the written report of the evaluation committee, the committee's recommendations contained in that report, and the responses of the institution to both the report and the recommendations. The actions that the Board of Commissioners takes will be based on these materials and will reflect both the Board of Commissioners' experience of applying the Commission's Standards and the decisions it has made regarding other institutions.

- VIII.B.3 Subcommittees of the Board of Commissioners will give preliminary consideration to evaluation committee reports and recommendations. Members of the Board of Commissioners may not serve on a subcommittee considering a report from an evaluation committee on which they served, nor may they vote on decisions about schools they visited.
- VIII.B.4 Any school about which the Board of Commissioners is considering an accreditation action has the right to request an appearance by its designated representative(s) before the Board of Commissioners or a subcommittee of the Board of Commissioners.
- VIII.B.5 Letters reporting the actions of the Board of Commissioners will be sent to schools no later than 30 days from the date of the action.
- VIII.B.6 When an institution plans to close, or if the Board of Commissioners determines that an institution is in danger of closing, the institution shall be required to provide a plan detailing agreements with other institutions and the means of support necessary to allow students to complete the degree programs to which they were admitted in a manner and at a cost consistent with their enrollment in the institution that is closing.
- VIII.B.7 Accreditation is a continuing relationship between an institution and the Commission, which is subject to review and consideration.

IX Evaluation Committees

- IX.A Committees evaluating institutions for initial accreditation, for reaffirmation of accreditation, and for focused evaluations will be selected according to procedures adopted by the Board of Commissioners and published in the *Self-Study Handbook*.
- IX.B The Board of Commissioners and its staff will receive nominations for potential visitors from the executive officers of any institution that is a member of the Commission.
- IX.C The Board of Commissioners will provide the resources, training, and staff support to ensure informed and responsible work by members of evaluation committees.
- IX.D Evaluation committee members will be selected by ATS Commission staff, under the supervision of the Board of Commissioners and in consultation with the institution to be visited, and with due consideration of the purpose, programs, and context of the institution. At least one member of the committee will not be a member of the Board of Commissioners or ATS Board of Directors. Schools may object to the appointment of persons to a committee if the appointee has attended the school as a student or been employed by the institution. The number of persons appointed to evaluation committees will vary according to the nature of the visit and will be determined in consultation with the institution.
- IX.E If a school is given permission by ATS Commission staff to host a joint evaluation visit with another accrediting agency (see *Policies and Procedures*, XIII.D), the composition of the committee will be negotiated by ATS Commission staff with that agency to ensure that all committee members are mutually acceptable.
- IX.F Comprehensive evaluation visits normally require the equivalent of three days on-site at the institution, but that time may be adjusted in view of the size of the school and its overall situation. Committees conducting focused evaluation visits normally spend the equivalent of one or two days on-site at the institution.
- IX.G Members of evaluation committees serve without remuneration except for reimbursement of related out-of-pocket expenses, travel, meals, and other costs incurred.
- IX.H Committees are responsible for conducting their work and preparing their reports according to the guidelines provided by the Board of Commissioners in its *Self-Study Handbook*.

X Policy on Disclosure and Confidentiality

X.A Accredited Member status

X.A.1 The Commission will publish a *Membership List* on the ATS website. The *Membership List* reports the formal accredited status of schools, including accreditation status, approved degree programs, approved degrees at locations other than the institution's primary location, approved programs of distance learning, the date of the most recent comprehensive evaluation visit, the date of the next scheduled evaluation, and reports required of schools during the current grant of accreditation. If the institution is on probation or has notations, this status shall also be disclosed. An institution's entry will not be published until the period for receiving appeals of actions by the Board of Commissioners, as specified in these *Policies and Procedures* (Section XI below) and in the *Bylaws* of the Commission on Accrediting of the Association of Theological Schools (Article II, section 2.14), has expired. No adverse accrediting action will be published while an appeal is in process. Adverse accrediting actions are defined in Section VII.H above.

X.A.2 Accredited Members shall disclose the following information in their printed and/or electronic bulletin, calendar, or catalog: the status of their accreditation with the following language "the school is accredited by the Commission on Accrediting of the Association of Theological Schools," and provide the Commission's mailing address and phone number. Schools shall also disclose the status of each degree program with the following language: "The following degree programs are approved by the Commission on Accrediting (name of degree programs)." When schools have been approved to offer full degree programs at more than one site, the school shall disclose this information as well.

X.A.3 Candidate members shall publish their formal status with the Commission as "Candidate for Accredited Member status."

X.B Self-study reports

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

X.B.2 The Board of Commissioners 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 of Commissioners 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 Council for Higher Education Accreditation and the US Department of Education may be allowed access to self-study reports in conjunction with the process of recognition that the Board of Commissioners undergoes with these entities.

X.C Evaluation committee reports

- X.C.1 As part of the accreditation process, reports prepared by evaluation committees of the Board of Commissioners shall be made available to governing boards and faculties by the chief executive officers of the schools.
- X.C.2 An institution may make public the report of an evaluation committee, although this is not mandatory and is not advisable prior to formal action by the Board of Commissioners. If the institution makes a report public, it must make clear that the document is a report of the evaluation committee to the Board of Commissioners and is not an action of the Board of Commissioners.
- X.C.3 The recommendations of the evaluation committee to the Board of Commissioners shall not be published by the institution as actions. Only the actions of the Board of Commissioners comprise the formal accreditation.
- X.C.4 If, in the judgment of the Board of Commissioners, a school publishes selected portions of a report on an accreditation evaluation in such a way as to distort the overall import of that report, the Board of Commissioners has the authority to release the full text of the report in question.
- X.C.5 The Board of Commissioners will not release evaluation committee reports to the public. With the approval of the institution, the Board of Commissioners may approve access to a report to those conducting research that contributes to the improvement of the accrediting process. Evaluation committee reports may be examined by the Council for Higher Education Accreditation and the US Department of Education only in the context of reviews of the Board of Commissioners by those agencies, for the purpose of recognition. Evaluation committee reports will also be shared with regional accrediting agencies in the case of dually accredited schools.

X.D Other accrediting documents

- X.D.1 Minutes of the Board of Commissioners are available to the members of the Board of Commissioners. A summary report of all actions of the Board of Commissioners is published biennially in the *ATS Bulletin*.
- X.D.2 An institution that has officially appealed an adverse action of the Board of Commissioners may request those sections of official minutes that pertain to the adverse action.
- X.D.3 Correspondence between the Board of Commissioners and a member or an applying institution shall be treated confidentially by both parties.
- X.D.4 Institutional reports will not be released to the public by the Board of Commissioners. These reports, however, may be released by the institution after action has been taken by the Board of Commissioners.
- X.D.5 The Board of Commissioners will share its correspondence to member schools with the appropriate regional accrediting agencies, with the Council for Higher Education Accreditation and the US Department of Education in conjunction with the recognition process, and, as required, with appropriate state or provincial authorities.

X.E Public statements by institutions

If an institution uses the public forum to take issue with an action by the Board of Commissioners relating to that institution, the chair of the Board of Commissioners may make available to the public any information pertinent to the decision. "Taking issue in a public forum" does not include an announcement by an institution that it intends to appeal an action of the Board of Commissioners.

X.F Disclosure by the Board of Commissioners of information about member or applying institutions

- X.F.1 Upon inquiry, the Board of Commissioners will release the following information about member or applying institutions:
 - X.F.1.a Membership and accreditation status.
 - X.F.1.b The dates when the Board of Commissioners conferred Candidate for Accredited Member status and, as relevant, granted initial accreditation.
 - X.F.1.c The dates of the last comprehensive evaluation and of the next scheduled comprehensive evaluation.

- X.F.1.d The date of the next scheduled focused evaluation visit and formal reasons for the visit.
 - X.F.1.e The date a formal application for membership began and the estimated date a decision on the application will be made.
 - X.F.1.f The date of denial of candidacy or removal from candidacy.
 - X.F.1.g The submission date and action taken on the most recent written report required by the Board of Commissioners.
 - X.F.1.h The Board of Commissioners' action subsequent to the last evaluation visit regarding accreditation.
 - X.F.1.i Whether an institution has appealed an adverse accrediting action of the Board of Commissioners and the status and outcome of such appeal.
 - X.F.1.j Actions of the appropriate appeal bodies with reasons for the actions.
- X.F.2 The *Membership List* will identify institutions removed or withdrawing from Accredited Member status or Candidate for Accredited Member status, and institutions placed on probation.
- X.F.3 The summary report of the Board of Commissioners, published biennially, identifies institutions removed or withdrawing from Accredited Member status or Candidate for Accredited Member status, or placed on probation during the period of the report.
- X.F.4 In all cases of adverse accrediting actions, a public statement about the action will be prepared in consultation with the institution for response to inquiries. The Board of Commissioners reserves the right to make final determination of the nature and content of the public statement. The Board of Commissioners will identify the reasons for the adverse accrediting action in the public statement.

XI Appeals of Actions by the Board of Commissioners

(cf. *Bylaws* of the Commission on Accrediting of the Association of Theological Schools, Article II, section 2.14, Appeal of Accreditation Decisions)

- XI.A Unless otherwise specified, the time for requesting an appeal shall be within 30 days from receipt of the letter reporting the action of the Board of Commissioners. The request for an appeal shall be in writing. Appeals are limited to decisions identified in Sections B and C below.
- XI.B Regarding actions of the Board of Commissioners related to the failure to approve new degrees, extension sites, or distance education programs, the imposition of a notation, or the imposition of probation:
 - XI.B.1 If the institution believes that the action of the Board of Commissioners is unjust or based on erroneous information, the institution shall, either on its own initiative or at the invitation of the Board of Commissioners, first meet with three Commissioners appointed by the chair of the Board of Commissioners to seek a mutually satisfactory resolution. The response of the Board of Commissioners to a written appeal, including relevant specifics, shall be communicated in writing.
 - XI.B.2 If, after such consultation, the institution believes the action of the Board of Commissioners still to be unjust or based on erroneous information, it shall have the right to appeal in writing within 60 days of the receipt of the written findings, to the Appeals Panel as elected biennially by member schools. Within 120 days after receiving the notice of appeal, accompanied by a consent and waiver to be bound by the provisions therein and hereof, the Appeals Panel shall arrange for a hearing to review the findings of the Board of Commissioners and the position of such member. The recommendation of the Appeals Panel, including relevant specifics, shall be made to the Board of Commissioners, which shall act on the recommendation. The decision of the Board of Commissioners shall be communicated in writing and shall be final and binding in accordance with the consent and waiver referenced herein (and as submitted concurrent with the appeal procedures).
- XI.C Regarding adverse actions of the Board of Commissioners that are defined by the *Procedures* as failure to grant initial accreditation or withdrawal of accreditation:
 - XI.C.1 If the institution believes that the action of the Board of Commissioners is unjust or based on erroneous information, the institution shall, either on its own initiative or at the invitation of the Board of Commissioners, first

meet with three Commissioners appointed by the chair of the Board of Commissioners to seek a mutually satisfactory resolution. The response of the Board of Commissioners to a written appeal, including relevant specifics, shall be communicated in writing.

XI.C.2 If, after such consultation, the institution believes the action of the Board of Commissioners still to be unjust or based on erroneous information, it shall have the right to appeal in writing within 60 days of the receipt of the written findings, to the Appeals Panel as elected biennially by member schools. Within 120 days after receiving the notice of appeal, accompanied by a consent and waiver to be bound by the provisions therein and hereof, the Appeals Panel shall arrange for a hearing to review the findings of the Board of Commissioners and the position of such member. The Appeals Panel shall make a decision to affirm, amend, or reverse the adverse action, or remand to the Board of Commissioners with instruction regarding its conclusions. The decision of the Appeals Panel is final and binding on both the Board of Commissioners and the member school. The Board of Commissioners in all cases will be responsible for implementing the decision.

XI.D The Board of Commissioners and the moving party/parties shall have the right to representation in person and by counsel, if desired, at any level of appeal, and the school may provide new or additional information at any level of appeal that further demonstrates that the school is appropriately implementing the Standards of Accreditation.

XII Complaints

The Commission has an obligation to the various publics it serves to give responsible consideration to complaints that may be made against any accredited school. The Board of Commissioners maintains policies and procedures for reviewing and responding to complaints. The complaint must be filed in writing, together with substantial documentation, as appropriate for the circumstance. The Board of Commissioners will determine if the complaint has standing with reference to any membership criterion or Standards of Accreditation of the Commission. If the complaint has standing, the Board of Commissioners will conduct an investigation. The Board of Commissioners will communicate its conclusions and actions to the institution and the party raising the complaint. The Board of Commissioners assumes no responsibility for or obligation to adjudicate individual grievances.

XIII Dual Accreditation

- XIII.A Any institution seeking or holding accreditation by more than one accrediting body recognized by the Council for Higher Education Accreditation or the US Department of Education must describe itself in identical terms to each recognized accrediting body with regard to purpose, governance, programs, degrees, diplomas, certificates, personnel, finances, and constituents; and it must keep each accrediting body apprised of any change in its status with one or another accrediting body.
- XIII.B The Board of Commissioners will withhold actions granting reaffirmation of accreditation, granting Candidate for Accredited Member status, or extending the term of candidacy to any institution that is currently subject to (1) an adverse accrediting action by another accrediting agency recognized by the US Department of Education or (2) an action by an appropriate governmental authority that may lead to suspension, revocation, or termination of the school's legal authority to provide degree-granting higher education. If, after review, the Board of Commissioners determines that the institution is in compliance with Commission Standards, it will proceed with the actions appropriate to Commission procedures, criteria, and standards.
- XIII.C The Board of Commissioners will withhold actions granting reaffirmation of accreditation, granting Candidate for Accredited Member status, or extending candidacy status to a college-related or university-related theological school, if the institution to which it is related is currently subject to an adverse action by another accrediting agency recognized by the US Department of Education or an interim action by a governmental agency leading to suspension, revocation, or termination of the institution's authority to offer degree-granting higher education. If, after review, the Board of Commissioners determines to grant candidacy, initial accreditation, or reaffirmation of accreditation to schools related to colleges or universities, subject to the conditions noted above, the Board of Commissioners will provide an explanation for its action to the US Secretary of Education and to the recognized accrediting agency.
- XIII.D Member schools that are dually accredited and desire to host a joint or coordinated visit should consult with ATS Commission staff at least a year prior to the visit.