Guidelines and Request Form for Degree-Approval Exemption

On rare occasions, a member school may wish to offer a graduate degree that it believes is within its mission as a theological school but, for various reasons, does not meet the Standards of Accreditation of the ATS Commission on Accrediting, though the degree is approved by some other recognized quality assurance agency.* One example is an ecclesiastical degree approved by an ecclesial authority but not covered by the ATS Standards (e.g., Licentiate of Sacred Theology or Doctor of Sacred Theology). Another example is a theologically compatible degree approved by another recognized accreditor but not within the ATS Standards (e.g., Master of Philosophy or Doctor of Psychology).

Historically, the ATS Board of Commissioners (the body delegated to make accrediting decisions on behalf of the Commission) has generally not allowed member schools to offer or list any degree that is not Board-approved— with the exception of the examples cited above, though such “exemptions” have been more implicit than explicit. Some member schools embedded in larger institutions have addressed the issue of non-Board-approved degrees by simply moving those degrees to another department, an option not available to free-standing members. A few member schools with dual accreditation have recently asked if they could offer online PhD degrees that are completely asynchronous, which the ATS Standards do not allow, but which their other accrediting agency does allow—if the schools clearly distinguish which degrees are approved by which agencies.

In the interests of fairness and consistency, the Board of Commissioners now provides these guidelines and this form for member schools wanting to request a formal exemption from Board approval for a graduate degree approved by some other recognized agency, with the understanding that such requests would be rare. If granted, an exemption allows member schools to offer degrees that are within their mission but outside the ATS Standards—provided those degrees, while not approved by the Board, are approved by some other recognized quality assurance agency and provided the school states publicly which degrees are approved by which agencies.

If an exemption is granted, the Board requires member schools to list that degree publicly with the other degrees it offers (per Policies and Procedures VII.A.5), with a note specifically stating that the degree is “not approved by the Commission on Accrediting of The Association of Theological Schools” [the agency’s full legal name] but is approved by [school inserts name and web address of recognized accrediting or quality assurance agency]. Requiring schools to state that publicly maintains the Board’s prerogative to make its own accreditation decisions, independent of what any other agency approves, and clearly communicates whether a program meets Commission standards and values. Because the Board has already granted exemptions for the historical examples cited above (e.g., ecclesiastical degrees), those schools do not need to submit this request.

The Board reserves the right to deny a request for an exemption, if it determines that the degree is not compatible with theological education or for other appropriate reasons. It will deny any request for an exemption for a degree that is not approved by some other recognized agency, since that would violate the principle of external quality assurance, a principle foundational to accreditation. Denial means the member school may not list or offer that degree. Schools considering whether to request an exemption for a particular degree are encouraged to contact their Commission staff liaison.

* A “recognized quality assurance agency” refers either to an accreditor recognized by the U.S. Department of Education or by the Council for Higher Education Accreditation (CHEA), or to an agency outside the U.S. that provides comparable quality assurance (e.g., a Canadian province or the Congregation for Catholic Education in Rome). “Approved” has different meanings depending on the agency. For example, institutional accreditors in the U.S. may “approve” a degree under a blanket approval for all degrees at that institution, but they also require specific approval for any degree that represents a substantive change in level or content. In Canada, “approval” may be based on whether the degree is offered by or in partnership with a higher education institution recognized by the province. In Roman Catholic seminaries, “approval” for ecclesiastical degrees comes from Rome.
Request Form for Degree-Approval Exemption

NOTE: Any member school wanting to offer a graduate degree not approved by the ATS Board of Commissioners must submit this exemption request form, unless the school has a prior exemption. The request must conform to the reasons and conditions stated in the preceding guidelines. The Board will then decide whether to grant the exemption and notify the school of its decision and its reasons.

1. Name of school:

2. Name, title, and email of person submitting request:

3. Name of the graduate degree for which an exemption is requested:

4. Brief description of the purpose and requirements of this degree:

5. Brief description of how this degree fits the school’s mission, constituencies, and resources:

6. Reason for requesting an exemption from Board approval (i.e., why this degree could not be approved by the ATS Board of Commissioners, even as an experiment, citing any applicable Standards):

7. Name and web address for recognized accrediting or quality assurance agency that approves this degree:

8. If this request is granted, the school understands that it must indicate clearly, wherever it lists the degrees it offers, that this degree is “not approved by the Commission on Accrediting of The Association of Theological Schools” [the agency’s legal name] but is approved by [school inserts name and web address of recognized accrediting or quality assurance agency]: __Yes __ No

9. If this request is denied, the school understands that it may not offer this degree or list it in its publications: __Yes __ No

10. Other comments:

Submission deadlines for this completed request form are April 1 for Board action in June or November 1 for Board action the following February. Please attach the completed form as a PDF in an email to the Director of Commission Information Services (with an optional copy to the school’s ATS Commission staff liaison). Thank you.

Note: Member schools participating in U.S. Title IV student federal aid programs that designate the Commission as their “gatekeeper” or “primary” agency should be aware that students enrolled in any degree exempted from Board approval are not eligible for Title IV funds, since those funds are limited to students enrolled in programs approved by the gatekeeper/primary agency.
Notification of Changes in Degree Delivery, Duration, or Content

*Policies and Procedures* IV.D.1 states: “Any school on probation must petition for approval to offer an approved degree through a new delivery method or to change by 25 percent or more the total credits or the content of an approved degree. All other schools must notify Commission staff within 30 days of offering an approved degree through a new delivery method or changing by 25 percent or more the total credits or content of an approved degree.” Here are three examples of when to use this notification form: (1) a school with comprehensive distance education approval begins to offer at least half of an already approved degree through a new modality, e.g., offering at least half of a residentially-delivered degree online *for the first time*; (2) a school reduces the total credits required for an already approved MA degree by at least 25 percent, e.g., from 48 credits to 36 credits; and (3) a school changes the content of an already approved degree by at least 25 percent, e.g., reducing or replacing the number of required courses by 25 percent or more (adding a new specialization to an approved degree does not require notification).

*This notification form may be submitted at any time, but no later than 30 days after implementing the change.* [If a school is on probation, it must petition and receive approval from the Board before implementing any of these changes, rather than use this notification form.] Commission staff will generally acknowledge this notification within 30 days of submission. Schools may use this form to notify staff of more than one change in more than one degree by completing all relevant portions.

1. Name of school:

2. Contact information for person submitting this petition:
   a. Name:
   b. Title:
   c. Email:

3. Indicate the type(s) of notification being submitted and then complete the items for that(those) type(s):
   o Changing the delivery method for an approved degree (complete Part A below)
   o Changing the duration (total credits) of an approved degree by at least 25 percent (complete Part B below)
   o Changing the content of an approved degree by at least 25 percent (complete Part C below)

**Part A. Changing the delivery method of an approved degree**

1. Name of approved degree(s) affected:
2. Previous delivery method(s) of approved degree (e.g., delivered on-campus):
3. New delivery method of approved degree (e.g., delivered offsite or online):
4. If offsite, is this additional location already approved (if not, submit petition):
5. If online, does the school have comprehensive distance education approval (if not, submit petition):
6. Briefly describe the reason(s) for and extent of this change in delivery:

Part B. Changing the duration (total credits) of an approved degree by at least 25 percent
1. Name of approved degree(s) affected:
2. Number of total semester credits (or equivalent credits) previously required for the degree(s):
3. Number of total semester credits (or equivalent credits) now required for the degree(s) [NOTE: For minimum credit requirements, see Standards 4.1, 4.6, 4.10, 5.1, 5.7, and 5.11.]:
4. Briefly describe the reason(s) for the change(s) in duration:

Part C. Changing the content of an approved degree by at least 25 percent
1. Name of approved degree(s) affected:
2. Nature of change in content of at least 25 percent (briefly describe the nature and extent of the change):

When finished, please submit this petition to the ATS Director of Commission Information Services by hitting the “submit” button below. You can expect a confirmation email within an hour—and an acknowledgement by your Commission staff liaison usually within 30 days. There is no fee for any notification (or any petition). Please do not send any paper copies or any emailed attachments; submit only this completed, online form (including any links to additional information deemed helpful).