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Petitioning for Change

The Board of Commissioners ("Board") has adopted the following policy regarding petitions for change (found in Appendix 3 of the Board Policy Manual; see also Commission on Accrediting ["Commission"] Policies and Procedures, Article VII.C).

1. Substantive changes that require petitioning for Board approval include the following:
   a. Change in an institution’s fundamental mission, legal status, ownership, name, location, or governing control
   b. Change in location(s) at which an institution offers at least 50 percent of an educational program (see Policies and Procedures, Article VI)
   c. Introduction of six or more distance learning courses (see Policies and Procedures, Article VI)
   d. The offering of a new degree program (see Policies and Procedures, Article V)
   e. A change in type of educational units
   f. A new contract or major changes in existing contracts for educational or administrative services that would affect the school’s conformity to the accreditation standards (including any contract for educational offerings with an entity not eligible to participate in Title IV programs)
   g. The acquisition of any other institution or any program or location of another institution
   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

2. In addition to substantive changes that require petitioning the Board for approval, certain other significant, but nonsubstantive changes require either a petition or notification to Commission staff.
   a. Changes requiring a petition to and approval by 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).
   b. Changes that require notification to and acknowledgement by Commission staff include (1) the termination of a degree program at a location (main campus or extension site) that will continue in operation (i.e., one not requiring a teach-out plan or agreement), and (2) the closing of an extension site that offers less than 100 percent of a degree program (i.e., one not requiring a teach-out plan or agreement).
   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 Commission staff to determine if the revision constitutes a change significant enough to require formal approval.

For guidance on submitting petitions for substantive change that are not described here, please consult the school’s staff liaison to the Commission on Accrediting. The staff liaison is also available for consulting on the petition guidelines described herein. Failure to provide appropriate information
for a petition could result in that petition being returned for resubmission and consideration by the Board of Commissioners at a later meeting. Substantive changes do not include exceptions that an institution may choose to make for an individual student.

In evaluating petitions, the Board of Commissioners will consider each one in light of that particular school’s larger context, including these factors:

- **Planning and Evaluation Capacity**: Has this school demonstrated a capacity to evaluate itself well and use those results to plan effectively and strategically?
- **Institutional Vitality**: Does this school have sufficient human, financial, physical, and technological resources?
- **Accreditation Status**: Does this school’s current or recent accreditation status demonstrate ongoing concerns reflected in numerous reports, focused visits, and/or notations?
Petitioning for Extension Sites or Multiple Locations

The *Educational and Degree Program Standards* (Standard ES, section 3) describe four different types of extension education (also called multiple locations in *ATS Commission Policies and Procedures*, Article VI): (1) branch campuses, (2) complete degree sites, (3) ongoing course-offering sites, and (4) occasional course-offering sites. (International sites are covered in “Petitioning for International Education” later in this Handbook.) The creation of an occasional course-offering site is not considered a substantive change and does not require a petition for approval, but those extension courses should be noted on the Annual Report Forms completed by member schools each fall.

In the context of Standard ES, section 3.2, the Board of Commissioners (“Board”) considers ten areas in reviewing these kinds of petitions. Those ten areas are listed in the online form, *Petition for Opening a New Extension Site*, and are also summarized below. Schools submitting petitions for a new extension site must complete the online petition form. If a new degree program is also being proposed for that site, then a petition for a new degree program must also be submitted at the same time (see pages 7–8 below).

1. **Location**: The location of the proposed extension site (give specific street and mailing address) and whether that site is part of any other entity (e.g., church or college).

2. **Scope**: The number of courses per year proposed for this extension site, as well as to what degree program(s) they will apply and what percentage of the degree program(s) can be completed there.

3. **Purpose**: The purpose of the proposed extension offerings at this particular site and how that fits the school’s mission and the constituency’s needs (include results of the school’s needs analysis [e.g., market survey, church/college invitation, constituency conversations, etc.]).

4. **Educational Resources**: The educational resources (faculty, library, technology, student services, etc.) available to support this extension program. Include a list of proposed faculty and their credentials, identifying which ones are main campus-based and which ones are extension-based. If any of the needed educational resources (e.g., library or technology) are to be supplied by another entity, provide a copy of the formal agreement(s) to that effect.

5. **Facility Resources**: The facility resources to be used for the proposed extension program/site. Describe those facilities with some specificity (e.g., two classrooms seating 20 each with data projectors and wireless capability, as well as a student lounge, a private office for advising students, ADA access, ample parking, and an onsite library of 2,500 selected volumes with remote access to campus library).

6. **Financial Resources**: The financial resources projected for this extension program/site. Include a proposed three-year budget showing projected revenues (e.g., how many students in how many classes paying how much tuition) and expenses (e.g., instruction, marketing, facility costs, etc.).

7. **Impact**: The impact the proposed extension program/site will have on existing degrees and resources of the institution. (For example, will this program create significant teaching overloads for faculty or reduce enrollment in other degree programs or locations?)
8. **Standards**: The manner in which the proposed extension offerings meets the standards for the individual degree program(s) toward which credit can be applied. (If a complete degree is to be offered at the extension site, describe here the availability of all the educational and formational opportunities necessary to achieve the goals identified in the standard for the degree program.)

9. **Authorization**: The institution must demonstrate that it has the necessary and appropriate authorization (internal and external) to operate the proposed extension site.

10. **Assessment**: The institution must demonstrate how it will evaluate the effectiveness of the proposed extension program and site, including assessment of the student learning outcomes associated with the degree(s) involved and how that assessment will be incorporated into the institution’s overall assessment plan.

### Approval process and site evaluation visits

In addition to the petition (and supporting documentation), the Board of Commissioners will require a site evaluation visit if a member institution proposes either an extension site offering a full degree program or an extension site offering ongoing courses where half or more of the credits required for an approved degree may be completed. This site evaluation will be conducted before the Board takes final action on the institution’s petition. The Board of Commissioners will review the petition and take action regarding the suitability of the proposed extension site. If the proposed extension site appears to be suitable, the Board will authorize the initial operation of the extension site and a focused evaluation visit to occur within six months of the site’s initial operation as a location offering 50 percent or more of an approved degree program.

The institution will notify Commission staff of the actual date of initial operation. Commission staff in cooperation with the institution will arrange for the required site evaluation visit. The focused evaluation committee will conduct a site visit and submit recommendations to the Board. The Board will take final action based upon the focused evaluation committee’s recommendations and any other material submitted by the institution. As the entire approval process may take twelve to fourteen months, institutions are encouraged to plan accordingly.

### Deadlines

Petitions should be of adequate length to respond sufficiently to the areas listed on the online form, *Petition for Opening a New Extension Site*. Petitions must be received by April 1 for consideration in the Board of Commissioners’ summer meeting or by November 1 for consideration in the winter meeting. Institutions accredited both by the ATS Commission on Accrediting and by a regional association should note that the requirements of the two associations for approval may differ.

### Exceptions

Consult the Board of Commissioners’ *Policy Manual*, sections III.A.1.e and f for exceptions to these guidelines for extension education petitions.
Petitioning for Comprehensive Distance Education (Online)

The most common type of distance education is online delivery, whether delivered synchronously or asynchronously. The Board of Commissioners does not require approval for offering five or fewer different courses through distance education. Those should simply be noted on the ATS Annual Report Forms completed by member schools each fall. However, “when as many as six of the courses offered in any approved degree may be taken through distance education, it will be considered a comprehensive distance education program, and the institution must petition the Board of Commissioners for approval, according to guidelines adopted by the Board” (Commission Policies and Procedures, Article VI.G.1).

[NOTE: The Board interprets the phrase “when as many as six of the courses offered in any degree program” to mean that a petition is required whenever a school wants to offer more than five different courses (not different sections of the same course) through distance education, regardless of when those courses are offered (in the same semester or over different semesters) and regardless of whether those courses apply to one degree program or multiple degree programs.]

This page describes those petition guidelines, which are based upon Standard ES, section 4, of the Educational and Degree Program Standards. That section of the standards defines and describes distance education expectations for member schools. Please note that the Board of Commissioners does not approve correspondence education. Such courses do not meet the Commission expectation that, regardless of how courses are delivered, “faculty shall have regular and substantive interaction with students throughout courses and be regularly available to mentor, advise, and counsel” students (Standard ES, section 1.6.2).

Approval of comprehensive distance education is recognition by the Board of Commissioners that an institution has the resources and capabilities to offer a variety of distance education courses. It is the approval of an educational delivery method rather than approval of a particular degree program. An individual institution may use comprehensive distance education approval to focus on a particular degree program or it may include a variety of courses that apply to more than one degree program (provided issues described in Standard ES, section 4.2.2, are appropriately addressed). Regardless, the residency requirements for any degree program to which those courses apply must be met (see section 3.1 of each degree program standard for residency requirements). Only Standard D degree programs may be offered completely online, though schools may petition for exceptions to the residency requirements of other degrees (see “Petitioning for Exceptions and Educational Experimentation” later in this Handbook). Courses offered in a hybrid format meet residency requirements only if the majority of instructor-directed learning occurs when instructors and students are in the same location (see Standard ES, section 4.2.19).

To ensure consistency and completeness, schools must complete an online form, Petition for Comprehensive Distance Education Approval. It lists various areas that the Board of Commissioners will consider in evaluating petitions for comprehensive distance education programs. Those areas include a broad range of factors that are based on the items described in the Educational and Degree Program Standards, Standard ES, section 4.2. Schools should be clear and concise in completing this form, which also requires three supporting documents: (1) a proposed budget, (2) a brief assessment summary, and (3) a copy of two course syllabi that illustrate the design and expectations of the proposed comprehensive distance education offerings.
Deadlines

Petitions should be received by November 1 for consideration in the Board of Commissioners winter meeting or by April 1 for consideration in the summer meeting. Please consult with your ATS Commission staff liaison regarding any questions that may arise in completing the required petition form.

NOTE: Once an institution has been approved for a comprehensive distance education program, it does not need to petition again to expand its online offerings for any of its degree programs, provided it continues to meet all applicable degree program standards, including residency requirements.
Petitioning for New or Revised Degree Programs

The Board of Commissioners (“Board”) has established the following guidelines to assist member institutions in preparing petitions for the Board’s approval of new or substantially revised degree programs.

Because the Commission on Accrediting, through the work of the Commissioners, not only accredits institutions but also approves degree programs offered by an accredited school, the school must seek the Board’s approval before it (a) introduces a new degree program; (b) revises an existing degree program significantly (see section 3.e of Appendix 3 of the Board Policy Manual for what constitutes a significant revision; or (c) offers an existing approved degree, or portion thereof, at a new location. (For the latter, see “Petition for Opening a New Extension Site” above.) If the petition is for a new degree program, then it must use the online form, Petition for New or Revised Degree Program, which covers the same basic areas discussed below.

The Board of Commissioners may approve petitions for new or revised degree programs at the master’s level or for ongoing offering of courses at an extension site, based on review of the institution’s petition and documentation only. The approval of new doctoral programs and the approval of extension sites where more than half of a degree program can be earned will require the Board’s review of both the institution’s petition and the report of a focused evaluation committee authorized in response to the school’s petition. This procedure requires the Board of Commissioners’ attention at two regularly scheduled meetings. In no case should a member school admit students to, nor begin classes in, a degree program prior to receiving the Board’s written approval.

The institution’s petition should address all of the following factors, which the Board of Commissioners will consider in decisions regarding approval of new or revised degrees (the online form, Petition for New or Revised Degree Program, covers these same basic areas, so use it for new program petitions):

1. **Needs addressed by the proposed new or revised degree.** The petition should assess needs that the institution hopes to address with the new or revised degree. This assessment may include such elements as the requests of prospective students, a proposal by faculty to develop new or expand existing education emphases, or an initiative from a denomination or other sponsoring body. Typically this assessment will document the institution’s “market analysis” or feasibility studies as well as its ongoing attention to the constituencies it serves.

2. **Educational goals of the proposed new or revised degree in the context of institutional purpose.** The proposal should articulate the educational goals of the proposed program and relate these goals to the institution’s statement of purpose and goals. The proposal should identify the evaluative methods and procedures the institution intends to use to demonstrate the educational effectiveness of the new or revised degree program.

3. **Degree design and requirements.** The petition should carefully describe the degree in terms of its curriculum, requirements, and structure. These items should be presented with reference to the appropriate degree standards. The petition should clearly state the extent to which distance education and field-based educational experiences may be applicable to the new or revised degree program.
4. **Impact of proposed degree on existing degree programs.** The introduction of a new or revised program typically has some impact on existing programs. The institution’s analysis of that impact will aid the Board of Commissioners in its responsibility to assess the effect of the new or revised program on programs that the Board has already approved.

5. **Institutional resources required for the degree.**
   The petition should describe the institution’s assessment of the resources required and available to implement a new degree: faculty, administrative support, student services, library, finances, and facilities. The financial analysis should set the proposed program within the institution’s overall budget and financial planning. When an institution plans to support a program by means of resources shared with other entities, the petition should include the formal agreements that govern the projected sharing. For a revised degree, this section of the petition should address the impact of the revision in comparison to resources for the existing degree.

Petitions for new or revised degree programs must use the online form mentioned above. Petitions must be received by April 1 for consideration in the Board of Commissioners’ summer meeting or November 1 for consideration in the winter meeting. Institutions accredited both by the ATS Commission on Accrediting and by a regional association should note that the two associations’ requirements for approval of new degree programs may differ and thus should also consult the regional association for appropriate guidance.

### Change in Degree Nomenclature

The Commission on Accrediting’s Educational Standard, section ES.1.1.3, states: “Schools shall follow the recommended nomenclature for all Board-approved degree programs. In cases where governmental licensing, charter requirements, or institutional federation agreements preclude use of recommended nomenclature, the Board will consider alternate degree nomenclature . . .” In light of this Educational Standard and since the Commission approves all degree programs and lists those degrees by name in its official records, any school that desires to change the name of an already approved degree program must petition for approval. The petition need only address three questions as listed in the online [Petition for Change in Nomenclature for a Degree Program](#).
The Board of Commissioners ("Board") understands that the Educational and Degree Programs Standards seek to represent best practices among graduate schools of theological education. However, the Board also understands that what constitutes best practices changes over time, especially in today's fast-paced higher education context. Therefore, when these standards were adopted in 2012, they were meant to address not only rigor but also flexibility. To encourage the latter while maintaining the former, the Board has adopted this set of guidelines for schools petitioning for educational experiments and exceptions. While these two terms are not always mutually exclusive, for purposes of this policy the Board distinguishes them as follows.

An **experiment** is typically an innovatively designed educational program or approach that extends the meaning and practice of one or more existing standards. In a real sense, these educational experiments reflect the educational values and outcomes associated with theological education, but they do so in creative ways that may not have been anticipated by the standards. If done well, they are worth watching—perhaps even replicating. To that extent and like most experiments, such programs or approaches need to be tested over time to evaluate their enduring value to graduate theological education. Consequently, a petition for an experiment must specify a time frame (typically several years) during which the results of the experiment will be carefully assessed and evaluated—by the school and by the Board. Hence, all Board-approved experiments come with a Board-approved time limit. If the school desires ongoing approval after the specified time limit, then it must prepare a report for the Board that documents how the educational experiment has achieved the educational values and outcomes associated with theological education, including what changes, if any, are warranted by the ongoing evaluation of the experiment and what lessons have been learned that might benefit other schools. The Board will then decide whether to grant ongoing approval (see Educational Standard, section ES.1.6.1).

An **exception** is typically narrower in scope, addressing a particular degree program requirement (e.g., residency, duration, admission). Its approval is usually for an unlimited time. Unlike an experiment, an exception will not necessarily be innovative nor will it extend the meaning or scope of an existing standard in a new direction. Instead, an exception will seek permission to do something that the standard already allows—as a stated exception—or seek to allow what it specifically disallows. It will represent a different way to achieve the same educational outcomes and reflect the theological values associated with a particular degree program standard. Once approved by the Board, the exception may continue indefinitely, though the Board may still require interim reports in order to demonstrate that the exception does, in fact, achieve the same educational outcomes and theological values associated with that degree program standard (see sections 3.1.3 of Degree Program Standards A, B, C, and H; and sections 3.1.1 of Degree Program Standards E, F, G, I, and J).

Experiments by definition resist traditional categories and simplistic evaluation, but some guidelines (see below) are still necessary. The Board will evaluate experiments more carefully than exceptions, partly because they are so unusual, but also because they may expand significantly what the Commission considers valuable. Consequently, if a school petitions for an exception that the Board believes better fits the description of an experiment provided above, the Board may treat the petition not as an unlimited exception but as a limited experiment to be tried and
tested for a specified time. Periodically, the Board will reflect upon the experiments and evaluations it has approved to determine if they expand the boundaries of “best practices” sufficiently to warrant any revisions in the standards for the Commission membership to consider.

Any petition for an experiment or an exception* must address the following issues, using the online form, Petition for Educational Experiments and Exceptions. If the proposed experiment or exception involves a new degree program or new extension site or new comprehensive distance education program, a separate petition specifically designed for those substantive changes must also be submitted at the same time.

1. Is the school petitioning for an experiment or an exception? If the former, what time frame for this experiment is being proposed and what is the rationale for this time frame?

   NOTE: See distinctions described above, especially the italicized statement.

2. What is the nature of the experiment or exception being proposed and what section(s) of the standard(s) is (are) involved?

3. What is the need for this experiment or exception and how does it meet the school’s mission? If this petition is for an experiment, please also comment on how this innovation could expand the Commission’s understanding of best practices for graduate theological education.

4. How does this experiment or exception address the educational values and learning outcomes associated with the standard(s) involved?

5. If this experiment or exception involves residency or duration requirements, what evidence has been gathered or will be gathered to document that the student learning outcomes achieved are comparable to those associated with the typical residency or duration requirements? (Pay particular attention here to issue of student-faculty interaction, formational concerns, access to appropriate resources and services, sufficient technology, and the ability of graduates to pursue appropriate careers.)

6. What special resources will be required to implement this experiment or exception and how has the school budgeted to provide those resources?

7. What is the school’s plan for assessing the results of this experiment or exception in a systematic and sustainable manner over time and how will those assessment results be used to improve this exception or experiment (including any decision to discontinue it)?

In evaluating petitions for educational experiments and exceptions, the Board of Commissioners will consider each one in light of that particular school’s larger context, including, but not limited to, these factors:

- **Planning and Evaluation Capacity**: Has this school demonstrated a capacity to evaluate itself well and use those results to plan effectively and strategically?
- **Institutional Vitality**: Does this school have sufficient human, financial, physical, and technological resources?
- **Accreditation Status**: Does this school’s current or recent accreditation status demonstrate ongoing concerns reflected in numerous reports, focused visits, and/or notations?

If an educational experiment or an exception is approved, the Board will note that fact in that school’s accreditation history and in the Commission website listing the accrediting status of that school.

* NOTE: A school does not need to petition for an exception in cases involving an individual student (see Commission Policies and Procedures, Article VII.C.1). Nor does a school need to petition for an exception for the duration requirement for academic master’s degrees as described in Degree Program Standard D, section D.3.2.1.
Petitioning for Candidacy for Accredited Membership

The Policies and Procedures of the Commission on Accrediting require that an institution seeking candidate for accredited membership follow these three steps (see Commission Policies and Procedures, Article II).

First: Written notification

The chief administrative officer of the institution should notify the accrediting staff in writing (email or mailed letter) that the school intends to petition the Board of Commissioners (“Board”) for candidacy status.

Second: Readiness Study

The applicant school shall undertake an internal study of its readiness for candidate for accredited membership. For the purposes of this internal study, the Board provides the following guidelines:

1. The study should begin with a brief overview of the school’s history, purpose, constituencies, goals, and long-term ambitions.

2. The study should provide a general assessment of the way in which the school reflects the General Institutional Standards and the Educational and Degree Program Standards for degree programs offered by the school. This readiness study is not a self-study; rather, it serves two purposes. First, because the criteria for associate membership are not the same as the standards for accreditation, this study provides an initial assessment by the applicant institution regarding the ways in which the school reflects the expectations of the standards for accreditation. Second, and based on the school’s assessment, the institution should identify the changes it will need to make during candidacy in order to be adequately prepared for its initial accreditation evaluation.

3. This study should be limited to approximately fifty pages of narrative text, plus appropriate supporting documentation. The text should address each of the Commission standards of accreditation. The study should reflect attention to the general guidance of the General Institutional Standards and the Educational and Degree Program Standards, and not focus on each subsection. The subsequent self-study, undertaken after the granting of candidacy for accredited status, will provide the opportunity for a more thorough review of each section of the standards. This study should examine the institution broadly in the context of the standards and provide answers for questions such as the following: In what ways does the school meet the standards? In what ways does the school not meet the standards? What will the school need to do during the self-study period to ensure that it meets the accrediting standards at the time of its initial accrediting evaluation visit? What evidences of institutional strengths and weaknesses become evident when viewing the institution through the perspective of the Commission accrediting standards?

4. In addition, this study should describe the institution’s tentative plan for undertaking its self-study, if candidacy is granted. Are the faculty, administrative, and financial resources adequate for the effort? What timeline does the institution propose to complete its required self-study within the two years of candidacy?

5. The study should reflect the judgments of the faculty and key administrative officers of the schools, but it need not be the result of a lengthy deliberative process. The energy for the longer, more consultative and deliberative process should be reserved for the self-study, if candidacy is granted.
6. The institution, upon the receipt of its letter of intent regarding petitioning for candidacy, will be assigned an accrediting staff member who will work with the school through the application process. The school should consult with the staff member and negotiate an outline for the report prior to beginning the work of the study.

7. Once the report is completed, the institution should send two coil-bound, double-sided copies of the readiness report and two coil-bound, double-sided copies of any appendices, as well as two electronic copies of both—saved as PDF files (on USB flash drives) to the Commission on Accrediting. Please consult with the ATS Commission staff liaison regarding when these materials should be submitted.

Third: Staff evaluation visit

Upon completion of the readiness study, the accrediting staff member will review it and schedule a staff evaluation visit. Because the purpose of the staff visit is evaluative, the staff member will interview students, faculty, administrative leaders, members of the governing board, library staff, alumni/ae, and other persons as appropriate to assess the institution in light of the Commission Standards of Accreditation. The staff member will prepare a report on the basis of the evaluation, and the Board of Commissioners will consider the institution’s readiness study and the staff report in its consideration of the petition for candidacy.

Candidacy (i.e., Commission membership) will be granted if the school successfully demonstrates that it either is or, at the conclusion of the period of candidacy, will be operating according to the \textit{General Institutional Standards} and the \textit{Educational and Degree Program Standards} and that it has the institutional capacity to evaluate its institutional and educational effectiveness.

The institution is responsible for housing, meals, and local transportation expenses incurred in the conduct of the staff evaluation visit, which typically lasts one night and one day for a visit to a main campus; it may be longer if one or more extension sites are involved. The Board of Commissioners typically is responsible for the cost of transportation to the campus, while the school covers transportation costs to any extension site(s).

Guidelines for candidacy petitions

The guidelines the ATS Board of Commissioners normally follows in granting petitions for candidacy are these:

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

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

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

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

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

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

The normal period of candidacy is two years, from either February through February or June through June, the two months in which the Board typically
meets. That two-year period actually extends until the next meeting of the Board that follows the last month listed (i.e., through the following June for a February to February candidacy and through the following February for a June to June candidacy). Candidate schools who cannot meet that two-year time line may petition for an extension, per ATS Commission Policies and Procedures II.A. If a school does not petition for and achieve candidacy status within five years of being granted Associate Membership status, the policies described in the ATS Policies and Procedures, Articles II.C.4 and II.E, apply.
Petitioning for Closing a Complete Degree Site: Teach-Out Plans

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

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

A teach-out plan may also include a teach-out agreement with another accredited institution. A teach-out agreement can be part of any teach-out plan if the school so chooses, but it is required under any of these four circumstances: (1) if the member school cannot provide through its own resources a reasonable opportunity for affected students to finish prior to closure, (2) if the loss of Title IV funds (for participating institutions) will not allow some students to complete their program even if the institution itself remains open, (3) if the Board, upon review of the teach-out plan, decides a teach-out agreement is also needed, or (4) if any of the three conditions described in the previous paragraph will result in the school or location closing before all affected students have completed their program.

In deciding whether to approve a teach-out plan, the Board of Commissioners will evaluate the overall plan based upon the three essential elements listed above: (1) equitable treatment for all affected students, (2) reasonable opportunity for those students to finish, and (3) notification to those students of any additional charges that may result from the teach-out arrangements. Those three essential elements are considered met when the Board finds evidence in the teach-out plan that the following issues are addressed:

1. A teach-out plan is not required if a school is closing an extension site that offers less than a complete degree program, and no other condition listed below obtains. However, the school must still notify Commission staff about the exact closing date and provide a brief summary of how it will meet the educational needs of affected students. If a school is relocating a campus or an extension site that offers a complete degree program, it must submit a Petition for Relocating an Extension Site (or Campus), which includes a teach-out plan since the former campus or location is still closing. A teach-out plan is not required if a school is simply terminating an existing degree program on its main campus or on a branch campus, provided all students in the program being terminated will be allowed to finish at that campus. Schools terminating a degree program on campus must still notify Commission staff of that decision, since the Commission maintains a record of all approved degree programs for each approved location. The notification must indicate the name of the degree program being terminated, the date the last student enrolled, the number of students still enrolled, an indication of how those students will finish, and the projected date at which the last student will finish. The school must later notify Commission staff when the last student has finished. Until then, the Commission will continue to list that program as approved, but with the designation of “discontinued,” until notified of the last student to finish and under the condition that no new students may be admitted. A school may suspend a program for up to a year without notification, but anything longer than one year will be considered a termination with notification required.
1. **Counsel and Communication**: The plan must describe how students are informed of the planned closure, their options for completing the closed program(s), and the length of time such options might take. The plan must include evidence (e.g., examples) of how the closure decision is communicated to all affected parties, especially students, but also faculty, staff, and other key constituents.

2. **Completion Options**: The plan must further delineate the various options available for students to complete their program with a minimum of disruption and how those options will be implemented, including such options as continuing to offer all the necessary courses at the location to be closed until students finish (provide projected course schedules), offering courses at a nearby location that is approved, offering online courses if appropriate and if approved to do so, helping students transfer to equitable programs, and/or establishing a teach-out agreement with an accredited institution in the area with comparable offerings.

3. **Student Plans**: The plan should append a list of all affected students with a brief note as to how the educational needs of each student will be met (i.e., which option(s) described above will be used by which students [e.g., Jones will graduate before closure, Smith will finish all required courses at that location before closure, Ortiz has chosen to transfer, etc.]). If the list of students is excessively long, it can be summarized by category (e.g., 20 students will graduate before closure, 30 students will finish courses at that location before closure, and the remaining 50 will participate in a teach-out agreement).

4. **Notification of Charges**: The plan must document any additional charges that students may incur as a result of the closure, including how and when students are notified of those charges.

5. **Anticipated Timeline**: The plan must specify the dates for how the closure will unfold, including these dates: the last students admitted, the first students will finish, the last students will finish, and the effective date of closure. If applicable, the timeline should also include when the institution or location will lose degree granting authority and/or access to Title IV funds.

6. **List of Other Accrediting Agencies**: If the program or location being closed is also accredited by one or more other agencies, the plan must list all of them, along with contact information, since the Board must notify them of any teach-out plan it approves.

The Board will also consider the information provided by the school in the required Petition for Closing a Complete Degree Site. If the closure means the school ceases to operate completely and permanently, the plan must indicate where all existing student records will be stored.

The Board will evaluate any accompanying teach-out agreement with another institution, using the following six criteria for that teach-out institution: (1) it is accredited by a nationally recognized accrediting agency for US schools or other appropriately recognized agency for Canadian schools; (2) it has the necessary experience, resources, and support services to provide an educational program that is comparable in quality, content, structure, and scheduling; (3) it remains stable and able to carry out its mission, while meeting all obligations to its existing students; (4) it can provide affected students access to necessary programs and services without requiring them to move or travel substantial distances; (5) it notifies students of any additional charges that they may incur; and (6) it documents that all of the above criteria are met through a written, teach-out agreement that is signed by both institutions, is consistent with applicable standards and regulations, and is submitted as part of the teach-out plan.

The Board will impose probation upon any member school that fails to submit an acceptable teach-out plan and agreement that is required by the Commission or federal regulations (see Policy Manual, II.C.4). If a member school closes without an acceptable teach-out plan, the Board, to the extent feasible, will work with the US Department of Education and the appropriate state agency (or provincial authority) to assist students in finding reasonable opportunities to complete their education without undue additional cost.
Petitioning for International Theological Education

The standards of the Commission on Accrediting permit accredited theological schools to offer programs of graduate theological education at sites outside North America. These programs must meet all relevant accrediting standards and be approved by the Board of Commissioners prior to their implementation. These guidelines are provided by the Board of Commissioners to assist schools in the development of proposals and to advise the schools of the issues the Board will consider in its determination as to whether a proposal should be approved as well as the procedures that will be involved in the process of evaluating the proposal and the program.

Issues and assumptions regarding international theological education programs

Issues

The Board of Commissioners assesses proposals for programs of credit-granting theological education outside of North America on the basis of the relevant accrediting standards and in the context of a historic concern, a contemporary reality, and a pervasive theme in the accrediting standards.

- The relevant accrediting standards by which proposals for programs will be evaluated include the standards related to extension education, appropriate educational and degree program standards, and the General Institutional Standards. The outline for proposals in these guidelines identifies specific sections of the standards to be addressed in proposals.

- Historically, efforts to introduce religion by North Americans outside of North America, while well motivated, appear in retrospect to have been imperialistic and to have mingled religious conviction and Western cultural ethos in ways that, ultimately, did not serve well either religion or people outside North America. These guidelines include a variety of criteria by which schools and the Board of Commissioners can assess the cultural sensitivity and appropriateness of the proposal.

- Contemporarily, North American higher education, including theological education, is experiencing a period of rapid change and redefinition. In the context of this pervasive change, the already difficult tasks of definition, design, and management of educational programs offered internationally become even more complex. The Board of Commissioners is responsible for the evaluation and approval of educational programs only as they relate to North American credit-granting forms of education. The guidelines require schools to give thoughtful attention to the North American character of the educational programs for which they are seeking approval.

- The accrediting standards of the Commission reflect a pervasive theme regarding the importance of the global awareness and engagement of theological education. While theme has more than one meaning among Commission member schools, the accrediting standards assert that theological schools in North America must, necessarily, attend to the experience and voices of people outside of North America and educate persons for religious leadership in ways that prepare them to work effectively among the non-North American cultures pervasively present within North America. The Commission emphasis on global awareness and engagement is not a reason for developing educational programs outside North America; it is a reason for educating North American students in ways that help them transcend their own cultural boundaries and...
for engaging theological scholarship so that it is widely informed by the understandings that emerge from different cultural contexts. The school’s responses to several questions about an internationally delivered program will provide the basis for assessing its capacity to enhance the global awareness and engagement of theological education.

Assumptions
The Board of Commissioners has identified three assumptions that will be reflected in its review of petitions for programs to be offered internationally:

- In various parts of the world, theological education takes many forms and serves a variety of purposes. North American graduate-professional approaches to theological education represent one of these forms and serve some of these purposes. Neither the Commission nor the Association assumes that North American credit-granting theological education is superior to other forms of theological education or that it is educationally effective in other cultural contexts. North American theological degrees, for a variety of reasons, often may be an inappropriate form of theological education outside of North America. If an institution and its international collaborators conclude that a North American credit-granting program is the most appropriate form to be offered at a site, then the Board of Commissioners and the accredited school have the responsibility to ensure that the program meets all relevant standards for North American theological education as defined by the accrediting standards. For this reason, the Board of Commissioners expects that the design of a proposed program will reflect collaborative work including the accredited school and its non-North American partner.

- The Board of Commissioners has determined that language is a difficulty—first in the language used to describe the program and second in the language of instruction used in the program. The standards are written for theological education located in a North American context, and while the standards require a program that is offered internationally to be culturally appropriate to the setting in which it is offered, the language the Board uses with reference to the degree is North American. Commission accrediting standards do not require the language of instruction to be English, but they do expect the faculty of the school offering the program to be able to oversee the academic quality of the program, which, because of the verbal nature of the theological disciplines, will require skill in the language of instruction.

- In the judgment of the Board of Commissioners, the categories of degree programs approved by the Board reflect differential levels of complexity when proposed to be offered at international sites. The degree programs that could be offered with greatest ease internationally are those identified as Basic programs oriented toward general theological studies. Degrees that require a previous Commission-defined theological degree can be offered with considerable ease; degrees grouped as Advanced programs oriented toward ministerial leadership, such as the DMin, fit this second category. The degrees that require more resources and raise more complex questions in their design and implementation for international delivery are those related to Basic programs oriented toward ministerial leadership (like the MDiv) and Advanced programs primarily oriented toward theological research and teaching.

Procedures for consideration of programs
The Board of Commissioners will first review a written proposal that addresses several issues regarding cultural and educational issues related to offering a program at an international site and a description of the program in terms of the relevant accrediting standards. Following its review of the written proposal, the Board may use a variety of methods to evaluate the proposal, typi-
cally including authorization of a site evaluation. Generally, approval of a program will be granted only upon the recommendation of a committee appointed to evaluate the delivery of the program at the proposed site.

Content of proposals

1. Cultural issues. The first part of the petition should include an evaluation of the program that reflects the following concerns and issues.

   a. The North American institution should first engage in some cultural analysis of the appropriateness of the educational goals and objectives of the program it proposes to offer for the cultural context in which it is proposing to offer the program. What do these educational goals mean in the culture of students who will be studying for the degree?

   b. The North American institution, in collaboration with a national constituency in the country in which the program is to be offered, should evaluate the cultural capacity of the North American institution to offer the program in contextually and culturally appropriate ways. Does this institution have the skill and capacity to function transculturally?

   c. Programs should, in all cases, be offered in collaboration with a constituency in the country in which the program will be conducted. Is the institution responding to a legitimate invitation from the nation in which the program of study will be offered?

   d. The North American institution should, in collaboration with its international constituency, carefully evaluate the impact of offering a North American degree program on the educational efforts of other, indigenous, theological education institutions. Will the financial resources or possible prestige of a North American graduate program negatively affect the ecology of theological education in the country receiving the program? Will the national/North American partnership unduly hurt programs of national institutions that do not have North American partnerships?

   e. If the program is truly collaborative, the North American institution should be able to identify the ways in which it will be changed as a function of offering a program collaboratively with a constituency outside North America. How does the institution anticipate that it will be changed as a function of its partnership and the offering of an educational program internationally? Integrity in the partnership influences the flow of funds and patterns of financial support for the international program. Will the North American institution derive income from the international program, or will it be a financial contributor to the program as offered internationally?

2. Educational program issues. The second part of the proposal should give attention to the unique educational aspects of the program of instruction to be delivered outside North America.

   a. North American institutions have two primary options with regard to international theological education. One is to support a partner institution in the offering of a non-North American degree—a degree that conforms to the educational conventions of the country in which the program is offered. In this case, the Board of Commissioners has limited approval responsibilities. Another option is to offer North American degrees internationally to non-North American citizens. In this case, the North American institution should have a clear justification for offering a North American degree. What good does a North American degree contribute in a non-North American setting?

   b. If sufficient justification exists for a North American degree to be offered internationally, then the school should be able to identify the practices and policies that
will ensure the degree is, in fact, a truly North American degree. While contextually appropriate, how does the institution deal with language, culture, and institutional resources so that these students truly have the benefits of a North American degree, whatever those benefits may be?

c. The school, with the help of its international constituency, should be able to demonstrate the support of other theological education institutions in the country in which the program will be offered.

d. The institution should attend to the way in which the ethos of the institution is present in an educational program offered internationally. How is the unique character and ethos of a particular Commission member school evident in the program it offers internationally?

e. The institution should be able to demonstrate that the educational goals and objectives of the instructional program are being achieved. How will educational effectiveness be determined?

f. The institution should demonstrate that it has the necessary and appropriate authorization to operate the proposed international site.

3. Description of the program in terms of the accrediting standards. The proposal should address all areas of the standards that are appropriate to the program of instruction being proposed. Typically, these will include

a. attention to Standard ES, section 3, on extension education, especially section 3.1.5.1; and

b. the degree program standard for each degree to which credits from the international program of instruction will be credited.

Site evaluation visits of locations outside North America

1. Ordinarily, the Board of Commissioners will require a site evaluation at the location at which the program of instruction will be conducted; in all cases in which as much as 50 percent of the credits required for a Board-approved degree will be offered, a site evaluation must be conducted. As appropriate, the Board of Commissioners may invite a representative of a duly recognized quality assurance agency in the region of the proposed program of instruction to participate as a member of the evaluation committee. If the North American institution proposing the program of instruction is dually accredited, the Board of Commissioners will coordinate the site evaluation visit with the other accrediting agency.

2. The Commission-accredited institution is responsible for reimbursing the Board of Commissioners for all costs incurred in conducting the site evaluation visit, including travel, meals, lodging, immunizations required for travel, and the Board assessment fee.

3. Ordinarily, the Board of Commissioners will consider granting approval for international programs for a period not to exceed five years.
The Handbook of Accreditation of the Commission on Accrediting consists of the following sections:

Section One  An Introduction to Accreditation by the Commission on Accrediting of The Association of Theological Schools

Section Two  Guidelines for Conducting an Institutional Self-Study

Section Three  Guidelines for Institutions Receiving Accreditation Evaluation Committees

Section Four  Guidelines for Members of Accreditation Evaluation Committees

Section Five  Using the Commission Standards of Accreditation in Institutional Evaluation

Section Six  Guidelines for Petitioning the Board of Commissioners

Section Seven  Guidelines for Evaluating Globalization in Commission Schools

Section Eight  Guidelines for Evaluating Theological Learning

Section Nine  Guidelines for Evaluating Library and Information Resources