Rationale for New Guidelines for Achieving Initial Accreditation with the Commission on Accrediting of the Association of Theological Schools

Overview: In January 2020, the Board of Commissioners approved new Guidelines for Achieving Initial Accreditation and for Writing Readiness Reports. Those will become effective in July 2020 after the membership votes in June 2020 on new Standards and Policies and Procedures. The new guidelines are intended to address some long-standing concerns (see rationale below).

Prior to these new guidelines, all schools had to go through the same six steps to achieve initial accreditation: (1) gain ATS Associate Member status by being approved by at least two-thirds of the ATS membership after being recommended by the ATS Board of Directors based upon a formal application, staff visit, and staff report; (2) write a “readiness report” (abbreviated self-study) and host a staff visit to review that report; (3) be granted “candidacy” status by the Board of Commissioners (BOC) based upon the staff visit and report; (4) conduct a full self-study and submit a self-study report to the BOC to decide whether to authorize an initial accreditation visit; (5) host an initial accreditation visit conducted by a peer evaluation committee that writes a report recommending (or not) initial accreditation; and (6) be granted initial accreditation (or not) by the BOC based upon the school’s self-study report and the evaluation committee’s report and recommendations.

The new guidelines affect only steps (2) and (3) above; all other steps remain as before. Regarding step (2), the new guidelines allow some schools to skip that step—writing a readiness report and hosting a staff readiness visit—if they hosted a staff visit for Associate Membership within the last 18 months and if they are already accredited by another recognized accreditor. Regarding step (3), the new guidelines eliminate for all schools that step—candidacy status—because all Associate Members (after June 2020) are considered candidates (without that label) for reasons explained below.

Rationale:

1. The new guidelines provide our increasingly diverse schools a flexible but rigorous pathway to accreditation. These new procedures are closer to our pre-2004 practice when candidacy (which ATS first used in 1981) was not a separate membership category, but part of a process for Associate Members to become accredited, with some schools granted candidacy when they became Associates.

2. The new guidelines reduce the administrative and financial burden for schools that are prepared to move sooner rather than later towards accredited status, by eliminating the need to write a readiness report and pay for a staff readiness visit, especially since staff would have recently visited those schools as part of the Associate Membership application.

3. The new guidelines recognize the significant change (in ATS’s understanding of what candidacy means) that occurred in 2012, when ATS notified USDE that it would no longer consider candidacy to be a “pre-accredited” status eligible for Title IV financial aid. ATS did so because it grants candidacy based on a staff visit, not a peer review visit (unlike other accreditors) and because ATS’s understanding of what “progress toward accreditation” means for a candidate/pre-accredited school was (and still is) different from what USDE means—and from what other accreditors mean by candidacy. [NOTE: Associate Members have never been and still are not eligible for USDE Title IV financial aid. Candidate Members have not been eligible since 2012. So, these new procedures have no effect on Title IV status.]
4. The new guidelines address the resulting confusion and inequity that occurred with the 2012 change. The confusion comes from ATS using the term candidacy differently than other accreditors use it. The inequity arises from candidate schools having been the only Commission members not required to meet ATS Commission Standards nor follow ATS Commission Procedures, though still eligible to vote on both.

These new procedures also eliminate the discrepancy between the ATS Bylaws (2.1-2), which recognize only two categories of membership—Associate and Full (Accredited), and the Commission Bylaws (2.1-2), which add a third category—Candidate for Accredited Member status), which is why the membership will vote in June 2020 on revisions to Commission Bylaws (see Appendix). In addition, these new procedures reduce the workload not only for many member schools, but also for the Board of Commissioners and for staff, cutting perhaps by 40% the number of readiness reports and visits needed.

NOTE: This Commission document contains an Appendix with proposed revision to the Commission Bylaws regarding how Associate Members become Accredited Members. It also contains also corollary proposed revisions to three Association documents in these three supplements: (1) ATS Procedures Related to Membership, (2) Association Bylaws, and (3) ATS Guidelines for Renewing Associate Membership.
Appendix: Revisions to Commission Bylaws Regarding How Associate Members Become Accredited

[The ATS Board of Commissioners voted in January 2020 and the ATS Board of Directors voted in December 2019 to recommend these revisions in the Commission Bylaws to their respective memberships in June 2020]

[NOTE: Sections 9.1 and 11.1 of the Commission Bylaws requires both the Association Membership and the Commission Membership to approve any changes to the Commission Bylaws, which is why the Board of Directors and the Board of Commissioners have both recommended these changes to their respective memberships.]

Commission Bylaws

In the 78 sections of the Commission Bylaws, only the following four sections require any revisions regarding the new guidelines for achieving initial accreditation, which involves replacing the formal membership category of “Candidate” in favor of treating all Associate Members as “candidates” without the label (see Association Bylaws, 2.1, in Supplement 2). While this change eliminates the current Commission membership category of Candidate, all six schools that currently hold candidate status will be grandfathered and allowed to retain that membership status until they achieve initial accreditation. All six schools have been notified of that.

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Section 2.1 Eligibility Membership in the Commission is limited to schools located in the United States and Canada that (i) offer graduate, professional theological degrees, (ii) are demonstrably engaged in educating professional leadership for communities of the Christian and Jewish faiths, (iii) are members of ATS (except as set forth in Section 2.13 below), and (iv) meet the Standards of Accreditation for Accredited Member status (for accredited schools) or criteria for Candidate for Accredited Member status (for candidate schools) (together “Eligible Schools”). A Member that ceases to be accredited by the Commission or to be a candidate for accreditation or that ceases to be an Eligible School, including without limitation by virtue of ceasing to be a member of ATS (except as otherwise provided in Section 2.13 of these Bylaws), is no longer eligible for membership in the Commission, and such Member’s membership in the Commission may be terminated as provided in Section 2.13 of these Bylaws.

Section 2.2 Election to Membership The Members of the Commission shall comprise the Eligible Schools that are granted Accredited Member status by the Commission or are conferred Candidate for Accredited Member status by the Commission. Membership continues for so long as the school remains an Eligible School, timely pays all dues, and is accredited by the Commission or is a candidate for accreditation, provided that a Member may voluntarily relinquish membership and accreditation by so notifying the Commission in writing and, provided further, that membership may be terminated in accordance with Section 2.13 of these Bylaws.

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Section 2.4 Duties of Membership Each Member must (i) maintain its accreditation or candidacy for accreditation by the Commission ..., (ii) deliver to the Commission annual dues in an amount determined from time to time by the Members, (iii) continue to be an Eligible School, and (iv) provide institutional data to the Commission annually and when requested by the Commission in connection with its accreditation activities.

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Section 3.2 Number and Term ... [a public Commissioner cannot be at a school that] holds either Accredited Member status or Candidate for Accredited Member status by the Commission.
Supplement 1: Proposed Revisions to
ATS Procedures Related to Membership
Regarding How Associate Members Become Accredited

[ATS Board of Directors voted in December 2019 to recommend these revisions in ATS Procedures Related to Membership for approval by the ATS Membership in June 2020]

ATS Procedures Related to Membership

NOTE: In this 6-page document [approved in 2004; II.C.1 revised in 2012], only the following five sections (out of more than 40) have revisions related to how an ATS Associate Member achieves initial accreditation with the ATS Commission on Accrediting. The first revision in II.B.5 below aligns with the ATS Associate Member application form in use since 2016, which replaces the previous “waiver and consent form.” The second revision in II.C.1 clarifies that Associate Members are not required to meet the standards. The third revision in II.C.4 aligns with the ATS Bylaws, 2.2. The fourth revision eliminates section II.D entirely. The fifth and final revision eliminates section II.E.2, since it would be superfluous in light of revisions to II.C.4.

II.B.5. The Board will review the school’s application, the ATS Commission staff report, and letters of support from Association member institutions, and the school’s signed waiver and consent form regarding appeals as a basis for the Board’s decision. The Board may take one of several actions...

II.C.1. The institution shall continue to meet the Membership Eligibility Criteria and conduct its degree programs in conformity to the Commission’s Educational Standard and Degree Program Standards.

II.C.4. At the end of each five-year term of its Associate Membership, if the institution has not petitioned for Candidate for Accredited Member candidacy status, it shall make a comprehensive report to the ATS Board, petitioning for renewal as an Associate Member either petition the ATS Board for one additional five-year term of Associate Membership (following the Guidelines for Renewing Associate Membership, or notify the ATS Board that it is voluntarily withdrawing. [See Supplement 3 below for Guidelines.]

II.D. Candidate for Accredited Member status: In response to a petition from an Associate Member school, the Board of Commissioners may confer Candidate for Accredited Member status on the school.

II.E. Withdrawal from membership

II.E.1. A school may, on its own initiative, withdraw as an Associate Member by written notice to the Board.
II.E.2. If the Board determines that an institution should move toward candidacy, but it declines to do so, the Board may recommend to the Association the institution be withdrawn from membership.
Supplement 2: Proposed Revisions to Association Bylaws Regarding How Associate Members Become Accredited

[ATS Board of Directors voted in December 2019 to recommend these revisions in the Association Bylaws for approval by the ATS Membership in June 2020]

Association Bylaws

In the 75 sections of the 34-page Association Bylaws only the following two sections have any revisions regarding how Associate Members achieve initial accreditation. These changes are consistent with the current Association Bylaws that describe only two categories of membership: Full and Associate [see Section 2.1 below]. That aligns with the new guidelines that no longer treat candidacy as a category of Commission Membership. The first revision deletes two words that require all members to meet the standards, since Associate Members are not required to do so. The second revision limits renewal of Associate Membership to one additional five-year term (i.e., a total of ten years as Associate Member).

Section 2.1 Eligibility Membership in the Association is open to schools located in the United States and Canada that offer graduate, professional theological degrees, are demonstrably engaged in educating professional leadership for communities of the Christian and Jewish faiths and meet the standards and criteria for membership established from time to time by the Association (“Membership Eligibility Criteria”). The Association shall have two classes of members: Full Members and Associate Members. Associate Members and Full Members shall be referred to collectively herein as the “Members.” Members that are seeking accreditation by the Commission on Accrediting of the Association of Theological Schools (“Commission”) are referred to as Associate Members. Members that are then accredited by the Commission are referred to as Full Members. [Italics for emphasis, not revisions.]

Section 2.2 Election of Associate Members... [end of 2nd paragraph] The Association admits Associate Members with the expectation that they will pursue accreditation by the Commission. If an Associate Member is not accredited by the Commission prior to the conclusion of its initial five-year term but has requested in writing to be granted a second five-year term as an Associate Member and continues to satisfy the Membership Eligibility Criteria, the Board shall reevaluate the institution for a second five-year term of membership and shall either accept or reject the Associate Member’s request. The Board may grant such additional five-year terms as it deems appropriate does not grant more than one five-year term of renewal. [Italics for emphasis, not revisions; revisions are in red font, which would limit the renewal of Associate Membership to one additional five-year term (or a total of ten years). The last two sentences in Supplement 3 clarify what happens at the end of ten years if initial accreditation has not been achieved.]
Supplement 3. Proposed Revisions to

*Guidelines for Renewing Associate Membership*

[ATS Board of Directors approved these revisions in December 2019; no membership vote required]

This brief document, originally approved by the ATS Board in 2004, describes how an Associate Member renews its five-year membership if it has not achieved accreditation. The change in the first paragraph reflects current ATS Bylaws, 2.2. The other changes reflect recent practice; the last two sentences limit renewals to one five-year term.

The ATS Procedures *Related to Membership (II.C.4)* stipulate, with regard to associate membership, “At the end of each its first five-year term of Associate Membership, if the institution has not petitioned been granted accreditation by the Board of Commissioners for Candidate for Accredited Member candidacy status, it shall make a comprehensive report to the ATS Board, either petitioning the ATS Board of Directors for one additional five-year term of renewal as an Associate Member or notify the ATS Board it is voluntarily withdrawing. *(Bulletin, part 1, “Procedures Related to Membership,” II.C.A.)*

The Association *initially* grants Associate Membership on the recommendation of the Board of Directors; the Board alone may renew an institution’s Associate Membership. The Board bases its recommendation for granting initial Associate Membership on an Institutional Application a formal application for Associate Membership and the report following a staff visit. The purpose of the petition for renewal is to demonstrate to the Board that the institutional character that was evident at the time Associate Membership was granted is still intact, that the institution has been attending to the issues identified in the staff report, and that the long-term institutional intention remains to seek accredited membership.

The report should consist minimally, therefore, of three parts:

1.—Review of the eight criteria for associate membership *(Bulletin, part 1, “Procedures Related to Membership in the Association of Theological Schools, I.A. through H.),* indicating whether there have been any significant changes in the policies, practices, or characteristics presented in the original application.

2.—Review of concerns in the report of the staff visit or the board action, if any, indicating what steps the institution has taken in response.

3.—Affirmation of the continued commitment of the institution to meet the responsibilities of Associate Membership, with the eventual goal being the realization of accredited membership.

It would be appropriate to adduce other information, relevant to the renewal of associate membership. It should be possible adequately to address these issues in approximately ten pages.

The petition for renewal includes two components:

1. A cover letter, signed by the institution’s chief administrative officer and addressed to the ATS Board of Directors, stating why the institution is petitioning for a five-year renewal of Associate Membership, summarizing the reason(s) it was not able to achieve accreditation within the last five years and describing how it will be able to achieve accreditation within the next five years.

2. An updated ATS Associate Membership Application form, providing any new information since the institution’s last application regarding how it meets the membership criteria (e.g., any changes in mission, location, structure, degrees, faculty, enrollment, facilities, finances, governance, and administration).

The ATS Board of Directors will act on petitions for renewal of membership at a regularly-scheduled Board meeting and communicate its decision to the institution within 30 days. The Board renews Associate Membership for only one additional five-year period (i.e., ten years total). If an institution has not achieved initial accreditation at the end of ten years, it will be automatically withdrawn from Associate Membership. If that institution desires to pursue again Associate Membership, it must go through the formal application process like any other applicant school.