

Evaluation Committee Report
for
Comprehensive Evaluation Visit for Reaffirmation of Accreditation

for
Starr King School for the Ministry
Oakland, CA

on
09/23/2024 to 09/26/2024

for
The Board of Commissioners of
The Commission on Accrediting of
The Association of Theological Schools
10 Summit Park Drive
Pittsburgh, PA 15275

Onsite Evaluation Committee Members:

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Elmo Familiaran, Executive Minister, retired; The American Baptist Churches of New Jersey
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PART I. OVERVIEW OF SCHOOL, ACCREDITATION HISTORY, SELF-STUDY, AND VISIT

1. Overview of School

Starr King School for the Ministry (SKSM) was founded in 1904 as the Pacific Unitarian School for the Ministry and incorporated in 1906. The purpose of the school is “to educate the whole person in the service of love, compassion, and justice” both “for Unitarian Universalist ministry and for progressive religious leadership in society.” (Self-study p 15) Having adapted to many changes over its 120-year history, from conducting classes at the First Unitarian Church of Oakland at its inception to relocating twice in the past five years, SKSM remains steadfast in its commitment to expand theological education as one of the most progressive theological schools in North America.

SKSM maintains its distinctive mission, Educating to Counter Oppression and Create Just and Sustainable Communities (ECO-CJSC), which was first introduced in 2000. This was elaborated upon in the 2019 Self-study into Eight Threshold competencies (see listing in Standard 4, below) that rely upon four learning goals (the “Four Cs”):

1. Cultivating multi-religious life and learning
2. Countering oppressions and embracing radical hospitality
3. Creating just and sustainable communities
4. Calling forth wholeness, healing, and liberation

SKSM offers two professional master’s degrees, the Master of Divinity (MDiv) and the Master of Arts in Social Change (MASC), through a fully online educational modality, a shift that took place as a result of the COVID-19 pandemic in 2020. However, SKSM’s early adoption of online technology beginning in the 1990s prepared the school to pivot during the pandemic and to continue teaching full online degrees as the school underwent significant shifts in the past five years. With the move of the school, first to Mills College in Oakland in 2020 and then to an office suite in downtown Oakland in 2022, SKSM has become a *de facto* online seminary. The second major shift was the school’s withdrawal from the Graduate Theological Union (GTU), initiated in 2020 and finalized in 2022.

Overall, these changes have resulted in new academic programs, including MDiv degree concentrations and Certificates in Chaplaincy, Unitarian Universalism, and Psychedelic Justice and Companionship. With the launch of the Center for Multi-Religious Studies in 2022, SKSM also instituted a Certificate in Multi-Religious Studies.

While challenges and opportunities for the institution continue, Starr King School for the Ministry remains committed to embodying its mission in every aspect of its life. As stated in the Self-study, “Starr King has made great strides in the development of sustainable, comprehensive, and appropriate structures and policies to carry out our mission in the post-pandemic world. These accomplishments occurred amid unexpected and dramatic challenges to stable institutional functioning, requiring extraordinary, responsive efforts on the part of staff” (Self-study p 9). The commitment of SKSM’s board, administration, faculty, and staff is commendable in this regard. Moving forward, the school seeks to find ways to increase support for its human and financial resources toward institutional sustainability and flourishing.

2. Overview of Accreditation History and Accreditation Status

Starr King School for the Ministry was first granted accreditation in June 1978 “by virtue of participation in the GTU.” The institution was accredited four more times for various periods in 1983, 1988, 1998, 2010, and 2020, with the last accreditation being for a period of five years. In the previous accreditation period, the school was approved for the MDiv and the MA in Social Change (professional MA) and to offer comprehensive distance education. Throughout its history, SKSM has received requests for reports and/or notations regarding financial sustainability and institutional planning, as well as adequate human resources support and educational and institutional assessments. In recent years, two relocation approvals were granted, with the Board accepting the report from a focused visit conducted in fall 2021 regarding relocation to Mills College and approving a second relocation in 2022 to SKSM’s current location in downtown Oakland.

In January 2020, the Board of Commissioners voted to reaffirm the school’s accreditation for a period of five years, due to “the school’s financial fragility and inconclusive strategic planning” and issued a notation (Notation N8.b, “*The institution’s financial resources are not adequate for long-term institutional vitality and there is no credible plan to address this issue in a timely and effective manner*”). As a result, the Board required a report

demonstrating that the school has financial resources that are adequate to support the programs, personnel (faculty, staff, students), and space both in the present and for the long term in their new location (Standard 8, section 8.2) and that the school engages in appropriate ongoing planning and evaluation procedures for institutional vitality and educational effectiveness, including the ability to provide the resources necessary to sustain the school (Standard 1, sections 1.2.2 and 1.2.2.1).

Upon receipt of a report addressing these items, the notation was removed by the Board in June 2021, with a request for a follow-up report on progress toward financial equilibrium due November 2022. At its meeting in January 2023, the Board voted to receive the report and “to remind the school to attend to the Board’s ongoing concerns regarding financial sustainability in their upcoming Self-Study Report for the comprehensive visit scheduled for fall 2024.” The evaluation committee reviewed documentation related to this and reports its findings below.

Finally, the school’s public statement of accreditation status on its website is consistent with the ATS membership directory, citing the correct listing of approved degrees and authorization of a comprehensive distance (online) education program (see <https://www.sksm.edu/about/association-of-theological-schools> and <https://www.ats.edu/member-schools/starr-king-school-for-the-ministry>, respectively).

3. Overview of Self-Study

The evaluation committee received a completed self-study in advance of its visit. Through conversation with the tri-directors of the self-study during the visit, the committee noted the thoughtfulness with which all stakeholders (faculty, staff, students, board) engaged the process. The directors remarked that given the amount of change that the school had encountered in the past few years, the self-study provided a moment for institutional reflection, most notably in terms of honest self-critique and areas for immediate improvement. The directors also provided specific examples of the ways in which broader conversations across constituencies led to generative insights and opportunities for further dialogue and

change (e.g., conversations on the meaning of “academic rigor” in Standard 3.2 and “shared governance” in Standards 9.6-9.8, and a conversation about the use of the term “mission” related to Standard 1).

The evaluation committee also noted the care and attention the self-study gave in addressing areas of concern from the previous accreditation visit, specifically regarding faculty advising load and movement toward educational and institutional assessment. Overall, the self-study report and appendices were adequate, but the committee noted some details lacking in the areas of educational and institutional assessment, financial resources, and strategic planning. Nevertheless, it is clear that an appropriate range of constituents participated in the self-study process and engaged professionally and eagerly with the evaluation committee. The committee appreciated the hospitality extended by the community at SKSM and the transparency demonstrated throughout the visit.

4. Overview of Visit

As stated above, the evaluation committee appreciated the professionalism and transparency on the part of all individuals interviewed during the visit. When additional documentation was requested while on-site, the school provided materials in a timely manner. The committee interviewed five senior administrators, eight trustees, four core faculty, seven advising faculty, one adjunct faculty, ten students, six alumni/ae, the library director, and several staff. Those whom the committee interviewed were candid in their responses, which were consistent with the self-study report; yet individuals also expanded appropriately in areas where the evaluation committee requested additional information.

The school did not receive any third-party comments prior to this visit. The ATS liaison received two comments from students during the visit, which the committee reviewed regarding concerns about scholarship award transparency, anonymous course evaluations, CPE support, and denominational relations. Both students also praised the school for the educational and formational foundations and support they received from SKSM.

SKSM participates in U.S. federal financial aid programs. The committee has completed and appended the “Requirements for Title IV Participants” (see Appendix). This list of requirements for Title IV participants does apply or does not apply to this school.

PART II. COMMITTEE RECOMMENDATIONS

After reviewing—in light of the Commission *Standards* and *Policies*—all relevant evidence provided in the school’s report and supplementary materials, as well as during the onsite visit and interviews, the evaluation committee makes the following recommendations to the ATS Board of Commissioners:

1. To reaffirm the school’s accreditation for a period of five years, until 31 March 2030, with the next comprehensive evaluation visit in fall 2029.

Rationale if less than maximum period: The need for a track record of budget surpluses, the upcoming presidential transition, and the need for updated and comprehensive strategic planning and evaluation warrants a shorter period of accreditation.

2. To approve the following educational offerings:
 - a. *Degree programs:*
Master of Divinity
Master of Arts in Social Change
 - b. *Distance education:* Comprehensive
 - c. *Additional locations:* None
3. To affirm these distinctive strengths to be maintained during the next period of accreditation:
 - a. A mission of educating to counter oppressions, cultivate multi-religious life and learning, and create just and sustainable communities that informs every aspect of institutional and educational life and is passionately embraced by a broad range of constituencies (i.e., students, faculty, staff, board, alumni).
 - b. Remarkable and mission guided flexibility that is evidenced in the school’s ability to navigate an extraordinary amount of change with a spirit of adaptability, collaboration, creativity, and determination to maintain the school’s unique place in educating for progressive religious leadership.
 - c. Pedagogical intentionality and clarity evidenced by a posture of risk-taking, openness, innovation, and flexibility on the part of faculty and staff, and a deeply embodied commitment to the intellectual, human, spiritual, and vocational dimensions of learning and formation through the school’s holistic, student-centered curriculum, co-curricular services, and activities that are cherished by the school’s students.
4. To highlight the following issues needing special attention during the next period of accreditation:
 - a. Demonstration of equitable, nondiscriminatory systems and processes for determining and communicating scholarships, financial aid, and implications of educational debt that are attentive to the duration of a student’s enrollment, regularly reviewed by the school, and updated as needed (see Standards 7.8-9, 10.4).

- b. The board's selection, care for, and evaluation of the school's chief executive officer (see Standard 9.3).
 - c. Continued mutual engagement in developing a bond of trust among the board, administration, faculty, staff, and students, where shared governance is clearly defined and appropriately implemented, recognizing the appropriate roles among the board, administration, and faculty that leads to increased communication, understanding, and decision making that supports the school's educational quality and financial sustainability (see Standards 9 opening paragraph and 9.6-8).
 - d. Adequate compensation and appropriate workloads for faculty and staff (see Standards 8.4 and 10.1).
5. To require the following reports to address areas needing improvement and/or further information:
- a. To require a report by the 1st of April 2026, regarding educational evaluation that engages appropriate stakeholders (e.g., faculty, students, finance, admissions and enrollment) and documents a simple, systematic, and sustained process of degree program evaluation that regularly gathers evidence related to each learning and degree program outcome (with a mixture of direct and indirect measures and quantitative and qualitative data). The report should include discussion of processes in place and results from evaluation conducted (see Standards 2.5-2.8, 4.5, and 4.9). The school is invited to consult the [Reflective Guide to Effective Evaluation for Theological Schools](#).
 - b. To require a report by the 1st of November 2026, demonstrating how the continuation of the five-year roadmap and/or its successor strategic plan tends to the review of the school's mission statement and the articulation of a plan that focuses on the most strategic priorities for achieving the school's mission, names the strategic priorities, identifies how each will be achieved, and includes the human, financial, physical, and technological resources needed for each priority. The report should (i) include evidence that evaluation plans have been adopted, are tied to strategic planning, and are implemented and regularly evaluated, (ii) engage appropriate stakeholders on a sustained basis to analyze and reflect upon how well the evidence indicates that each educational and institutional outcome is being achieved, and (iii) use those analyses and reflections for educational and institutional improvement and effectiveness (see Standards 2.3-7). The school is invited to consult the [Reflective Guide to Effective Evaluation for Theological Schools](#).
6. To impose the following warning(s) because the school, while substantially meeting the standards as a whole, is at risk of not meeting the following specific Standard(s). The school has two years to address this warning adequately, or the Board will take other appropriate action as described in the *Policies and Procedures*, III.G-J.:

Standard 10.3 on Financial Resources: While the school has taken steps to shift its financial model and eliminate budget deficits, it remains at risk of not having sufficient and stable revenue streams and financial resources to achieve its mission with educational quality and financial sustainability. It must submit a report by the 1st of November 2027, regarding operating results that demonstrate a trajectory toward a consistent pattern of surpluses over time. The report should include the school's plans for ensuring sufficient and stable financial resources to achieve its mission with educational

quality and financial sustainability, the FY 2024-25 and FY 2025-26 audits and management letters (if available), the school's analysis of its FY 2026-27 operating revenues and expenditures, and budget projections for FY 2027-28, FY 2028-29, and FY 2029-30 (see Standard 10.3).

PART III. COMMITTEE FINDINGS ON THE STANDARDS

1. Mission and Integrity

SKSM's mission is appropriate to the purposes and values of the school and also holds a unique place among ATS schools as a progressive theological and multi-religious institution. As one of two seminaries affiliated with the UUA, part of its mission statement includes the action "to educate people for Unitarian Universalist ministry" but also broadens its work to include educating "for progressive leadership in society." The evaluation committee observed a clear articulation of, and a passionate commitment to, the mission of the school throughout its visit by all constituencies (i.e., students, faculty, staff, board, alumni), exemplified in the president's remarks that SKSM is a "mission-driven institution." Several individuals during the visit mentioned that the school possesses a long history of commitment to justice, activism, and inclusion that began at its inception, being "early" to conversations and actions related to its mission of "educating to counter oppressions, cultivate multi-religious life and learning, and create just and sustainable communities" (or ECO-CJSC). This mission guides all institutional and educational activities and is an integral part of how the school operates in its day-to-day existence, with one just example being the creation and use of "classroom guidelines that set learning in a framework of equity, mutual care, and thoughtful engagement" (Self-study p 16).

Though the mission statement is referenced and embodied ubiquitously, it has not been formally reviewed for some time, as noted in the self-study (p 16-17). The evaluation committee encourages the school to institute a regular process of review by the board and relevant constituencies to ensure that it continues to reflect the school's current realities and future hopes (Standard 1.3). This reflection began during the self-study with discussion about the use of the label "mission statement" and can be expanded to include the entirety of the statement, with a clear process by which changes can be implemented.

With regard to integrity with constituents, various policies and resources have been instituted to improve communication and better manage student expectations in particular. These include revisions of tuition refund, satisfactory academic progress, and disputes policies, and clarifications regarding digital operations (Self-study p 17). Additional effort is being made to indicate that scholarship amounts dedicated to incoming versus continuing students may differ, so that students can engage in better financial planning and explore various sources of support.

SKSM is notable in its welcoming posture towards students of any religious background or worldview. The institution's integrity with diversity is attested by a variety of stakeholders, and particularly the student body. While desiring additional opportunities for connection, students appear to be mutually supportive and appreciative of one another's contributions to the learning environment. Students associated with the Unitarian Universalist tradition form a large contingent, but a variety of other denominational and faith perspectives are represented. The leadership and faculty represent various gender identities and religious beliefs as well.

Starr King complies with federal, state and local regulations, having updated policies to match requirements, and refiled for authorization to operate in California from the Bureau for Private Postsecondary Education (Self-study p 20). The school has gained approval to conduct online education in twenty-two states where their students reside and will continue to expand the list of states. SKSM has maintained practices and policies in accordance with ATS standards in its accreditation since 1978.

2. Planning and Evaluation

As the school prepares for a presidential transition, its board is exploring the implications of this succession for the overall mission and focus of the school. This transition is being attempted within a timeframe of about one year, with an expectation that a new president will be announced by June of 2025. The intention is to ensure the new leader maintains fidelity to the school's mission, upholds the ECO commitments, and strengthens involvement of all stakeholders (Standard 2.1). The board continues to develop self-evaluation instruments and performance evaluations of the executive team, including the president. The evaluation committee encourages the implementation of regular evaluation processes for these school leaders.

Starr King has instituted a "Five-Year Roadmap" for its strategic planning process, and at the time of the committee's visit the roadmap was in its third year. While the evaluation committee reviewed documentation demonstrating that critical conversations had been taking place per the roadmap and some new initiatives had been implemented, overall, there was inconsistent documentation and application regarding specific plans and resources in the roadmap. This included a lack of naming of key priorities and the resources needed to achieve those priorities, timelines for implementation, and assessment of outcomes. **Therefore, the committee recommends a report by the 1st of November 2026, demonstrating how the continuation of the five-year roadmap and/or its successor strategic plan tends to the review of the school's mission statement and the articulation of a plan that focuses on the most strategic priorities for achieving the school's mission, names the strategic priorities, identifies how each will be achieved, and includes the human, financial, physical, and technological resources needed for each priority. The report should (i) include evidence that evaluation plans have been adopted, are tied to strategic planning, and are implemented and regularly evaluated, (ii) engage appropriate stakeholders on a sustained basis to analyze and reflect upon how well the evidence indicates that each educational and institutional outcome is being achieved, and (iii) use those analyses and reflections for educational and institutional improvement and effectiveness (see Standards 2.3-7). The school is invited to consult the [Reflective Guide to Effective Evaluation for Theological Schools](#).** The committee recognized that informal assessment patterns and processes were taking place in some areas, and SKSM is implementing more formal processes in the midst of their five-year plan (Self-study p 24). The physical transitions and the pandemic required attention in recent years to maintaining core functions over making refinements.

Starr King takes student formation seriously, and there are assessments in place the help students to reflect on their areas of growth and improvement throughout all degree programs. The school also implemented an intake form to better assess the needs of students working in a range of contexts and with varying theological understandings. The information gleaned from the intake and initial assessment of thresholds of learning shape the curriculum and course offerings. For example, most courses include reflective writing centered on vocational goals and aptitudes (Standard 2.5).

Surveys of graduates are cited as one measure of school-wide educational effectiveness (Self-study p 29), documenting overall student satisfaction. The faculty participate in on-going assessment conversations about each enrolled student, noting challenges, formative progress, and vocational preparation. These conversations are logged in the minutes of faculty meetings.

Even with such efforts, however, educational evaluation was not found to occur in a systematic and sustained manner throughout the life of the school, or in a way that changes based on artifacts

measuring effectiveness were documented over time. This was especially evident in the lack of comprehensive evaluations for the two degree programs, the MDiv and MASC, neither of which had undergone a formal evaluation process that resulted in documentation still in possession of SKSM. (The evaluation committee was told that a review of the MASC was conducted a few years ago but that this report was lost.) **Therefore, the committee recommends a report by the 1st of April 2026, regarding educational evaluation that engages appropriate stakeholders (e.g., faculty, students, finance, admissions and enrollment) and documents a simple, systematic, and sustained process of degree program evaluation that regularly gathers evidence related to each learning and degree program outcome (with a mixture of direct and indirect measures and quantitative and qualitative data). The report should include discussion of processes in place and results from evaluation conducted (see Standards 2.5-2.8, 4.5, and 4.9). The school is invited to consult the [Reflective Guide to Effective Evaluation for Theological Schools](#).**

3. Student Learning and Formation

SKSM exhibits many strengths in its overall attentiveness to student learning and formation, noted through commitments to pedagogical intentionality and clarity evidenced by a posture of risk-taking, openness, innovation, and flexibility on the part of faculty and staff. There is a deeply embodied commitment to the intellectual, human, spiritual, and vocational dimensions of learning and formation through the school's holistic, student-centered curriculum, co-curricular services, and activities that are cherished by the school's students. Learning and formation are in alignment with the school's mission and as demonstrated by the Four Cs (program goals of the curriculum across both degrees):

1. Cultivating multi-religious life and learning (religious heritage)
2. Countering oppressions and embracing radical hospitality (cultural context)
3. Creating just and sustainable communities (religious and public leadership)
4. Calling forth wholeness, healing and liberation (spiritual formation)

As noted, each of the four Cs align with the four ATS general learning outcomes for the MDiv (found in Standard 4.3), as well as with the eight Threshold areas the school has developed for categorizing and planning course offerings.

Academic rigor is approached holistically by the school through a cadre of well-qualified and diversely equipped core, advising, and adjunct faculty who teach a range of content and experientially based courses. Rigor as defined by the SKSM “centers both scholarship and praxis in a non-competitive student environment and a variety of dialogic teaching approaches that seek to model counter-oppressive discourse and leadership” (Self-study p 33). Such approaches include reading, practices, and skill-building exercises that meet the varied needs of students. The incorporation of Communal Classroom Guiding Principles for all courses solidifies the school's prioritization of intercultural competency in student learning and formation, as well as the intentional centering of voices and perspectives traditionally underrepresented and marginalized within the Western academy, thus creating continuity in engagement across a distance (online) educational modality. This centering also includes voices and perspectives beyond the U.S., through online engagements with scholars and practitioners around the globe accessible through online platforms. Faculty and students referred to both the Guiding Principles and a centering of diverse and global perspectives during the evaluation committee's visit.

The institution fosters cultivating capacities for lifelong learning most effectively through its principles and practices of evaluation and its distinctive Initial and Threshold Self-Assessments. All courses adhere to a pass/fail grading scale, and faculty offer detailed constructive feedback throughout and at the end of each course that focuses on students' strengths and areas of growth. The self-study indicates that this form of evaluation helps to develop students into mature spiritual leaders who are "prepared to give and receive feedback, understanding the importance of developing their skills and knowledge for the community they serve" (p 35). The evaluation committee also was impressed by SKSM's attentiveness to human, intellectual, spiritual, and vocational formation through the Threshold Self-Assessment process engaged by all students and overseen by faculty.

SKSM is a fully online institution and utilizes an integrative LMS (Populi) for student courses, communications, financial aid, registration, and formational assessments. Administrators confirmed that this platform protects student privacy and maintains records according to applicable laws and policies. This online modality is appropriate to the mission and capacities of the school and helps students achieve degree learning outcomes in a variety of ways. Both faculty and students praised the current LMS as more user-friendly than the previous one and appreciated the standardization of course syllabi across the curriculum. With faculty and students located around the country and world, the evaluation committee recognized the importance of an integrative LMS in "cultivating a more connected, accessible, and user-friendly educational ecosystem" (Self-study p 37). All faculty and students are resourced by and receive support from the director of digital learning, and both this person and the dean of the faculty closely monitor students' ability to access curricula.

Student learning and formation are intentionally collaborative at SKSM and involve a faculty-intensive advising model. Both core faculty and advising faculty advise students, meeting with them online to discuss courses for registration and progress toward degree completion through the Threshold Self-Assessments process. With the creation of a new position in the director of spiritual services, some of the emotionally, spiritually, and mentally intensive needs of students have been directed more appropriately toward this person, thus alleviating the burden on faculty to attend to the entirety of student needs. This change was a direct result of the previous accreditation visit; and during this visit the evaluation committee heard from faculty, students, and staff that this shift has been a successful one.

A viable learning community is created through multiple avenues for students in online and hybrid modalities that in combination provide regular and substantive interaction between qualified instructors and students and among students, regardless of modality. Beyond intensive course evaluations and regular advising sessions, students engage with faculty and staff through affinity groups (online), monthly chapel services (online), individualized and group learning courses (online), annual Symposia (hybrid), and contextual education (hybrid). Commencement is also a hybrid event (in-person and online). In addition, student representatives attend part of regular faculty meetings and serve on the curriculum committee, as well as have the opportunity to be class Tech Ministers and apply to create and teach a course (with faculty oversight and support), thus further demonstrating frequent and consistent interactions among instructors and learners. Even as faculty and students lauded their interactions in a largely online format, however, the evaluation committee noted that individuals expressed hopes for more in-person opportunities as feasible.

The school publishes the academic program policies of the school in the student and faculty handbooks and the academic catalog. Academic policies are reviewed at least once a year. The process is a collaborative effort between the dean of students, dean of faculty, and education team. Any changes

are communicated to faculty, staff, and students. The policies are also accessible on the school website and monitored for accuracy. A recent revision has included new additions to the tuition refund policy to align with the requirements of various states where students reside. Updates were also recently added related to absence policies to meet federal regulations.

A recently revised transfer of credit policy is stated clearly in the admissions application and on the school website. Degree equivalency is recognized, and there are clear and stated policies for eligibility based on rubrics implemented by the school (Standards 3.11, 3.13).

The fully online program has been decisive in enabling students to have the ability to gain a graduate degree. But the school also aspires to open its doors of progressive/UU theological education to more students by creating non-degree certificates in the areas of UU studies, multi-religious studies, chaplaincy studies, and psychedelic justice and companioning. The UU studies certificate is most attractive to UU students studying in theological schools without a UU identity.

The school is in the process of structuring all SKSM certificate programs to be eligible for federal financial aid with the Department of Education, since not all SKSM certificates are currently eligible. Some of the certificate programs are also available to MDiv and MASC students as approved courses in their respective degree requirements.

4. Master's Degree Programs

4.1-5 Master of Divinity (MDiv)

The Master of Divinity is the flagship degree of SKSM. In this context, it is designed to prepare students holistically for vocations in parish ministry, community ministry, religious education ministry, hospital/prison/hospice chaplaincies, or related forms of religious leadership with congregations and the wider community. The degree currently requires at least 90 units of credit, but administrators report that conversation is taking place regarding the reduction of those requirements to the ATS minimum of 72 credits (Standards 4.1, 4.2).

The degree learning and formation requirements are robust, paying attention to the four critical vocational dimensions of religious heritage, cultural context, personal and spiritual formation, and religious and public leadership. Formation is happening within the classroom (asynchronously and synchronously) and through extensive writing, reflection, and other kinds of activities. The Eight Thresholds that offer a framework for assessment for the degree are:

1. Life and Religious Communities and Interfaith Engagement
2. Prophetic Witness and Work
3. Sacred Texts and Interpretations
4. History of Dissenting Traditions and Theo/alological Quest
5. Spiritual Practice and Care of the Soul
6. Theo/alogy in Culture and Context
7. Educating for Wholeness and Liberation
8. Embodied Wisdom and Beauty

Courses can be housed in any of the thresholds. Students are expected to take at least one course from each threshold. The school also offers independent research / studies, where students can create their own syllabus. The MDiv director decides and approves these studies, together with the faculty advisor and dean. Faculty are required by contract to teach two of these studies per semester.

Before the global pandemic, the pattern was already building that the school was moving away from a residential model. The shift to a completely online modality came more definitively with COVID-19. There are many ways in which learning communities are cultivated through online courses, both synchronously and asynchronously. In Populi, online breakout rooms for group discussions and group polls/surveys are incorporated into classes. Beyond the classroom, students have formed study groups, engaged in shared projects, and formed relationships in denominationally related and other social groups.

A growing strength of the school's MDiv program is the chaplaincy concentration, which was launched in 2021. There were 11 students in 2021, 11 in the 2022 cohort, 14 in the 2023 cohort, and 9 in the 2024 cohort. Most of these concentration students seek to become board certified chaplains. When students are received into the concentration, they engage in a multi-phased formation process that includes the completion of one CPE unit.

The MDiv requires supervised practical experience for completion of the degree, whether that be through a site placement or through a CPE unit. This is communicated in the catalog, handbook, and website. Evaluation of the supervised experience is completed by an onsite mentor, and faculty overseeing the course related to placement provide their own narrative evaluations for each student. SKSM categorizes two contexts for experiences: congregation and community. There are also two types of practical experience offered: 1) Field work, constituting a distinct project within a setting, and 2) internship, involving a fuller immersion into all dimensions of a context.

There is a comprehensive contextual education handbook that includes guidelines for students and mentors. Ongoing efforts are underway in developing additional supportive resources for mentors via video tutorials. Professors who teach contextual education collaborate on seeing to it that field education is aligned with the rest of the curriculum. For example, the congregational internship seminar includes guests with expertise in a practical area of ministry such as finances and conflict transformation. In January 2024, an intensive was designed for students entitled, "Possibilities and Perils of Congregational Ministry."

As mentioned in Standard 2, the evaluation committee heard from interviews across the school that pointed to a robust formation process at SKSM in the MDiv degree program. But the committee observed that the processes for educational evaluation are not systematically documented and codified, nor are they connected to data beyond the curriculum such as admissions, enrollment and retention, finances, vocational placement, and otherwise. **Therefore, the committee recommends a report by the 1st of April 2026, regarding educational evaluation that engages appropriate stakeholders (e.g., faculty, students, finance, admissions and enrollment) and documents a simple, systematic, and sustained process of degree program evaluation that regularly gathers evidence related to each learning and degree program outcome (with a mixture of direct and indirect measures and quantitative and qualitative data). The report should include discussion of processes in place and results from evaluation conducted (see Standards 2.5-2.8, 4.5, and 4.9). The school is invited to consult the [Reflective Guide to Effective Evaluation for Theological Schools](#).**

4.6-9 Master of Arts (MA) in Social Change

Starr King offers a two-year, 48 credit, professional Master of Arts degree focused on social change that aligns with the institution's mission and embodies the ECO framework that educates for countering oppression in its diverse manifestations. In addition to two required courses, one of which is a foundational ECO course and the other which involves a community internship, other courses enable students achieve the stated eight thresholds of learning that can undergird the capacity to nurture and participate in social change efforts in professional contexts. The program is well conceptualized and distinct. At present, the enrollment numbers provided in the school synopsis (Self-study p 13) show a modest headcount of 4-6 students, compared to the headcount of 60 for the MDiv program. This suggests that greater attention may need to be paid to recruitment and to touting the focus of the MA program to individuals working to mobilize communities and effect change in society over time.

The rationale for the development of this program two decades ago was that many students were dedicated to community work but did not intend to enter into formal ministry as a vocation. Furthermore, activists and community organizers were found in need of religious/spiritual education and grounding in religious studies to be effective in their mobilizing and ability to speak to issues of concern that account for religious worldviews.

The program also has stressed cultivation of practices that exhibit what it means to show up in community, to be present, open, and attentive to viewpoints and ideas other than one's own. In tandem, the development of threshold competencies came from a desire to develop language that would be more inclusive as communities became more intersectional.

Administrators and faculty are also clear that the "change" referenced in the program title is not meant to imply changing communities from the outside. The student/activist/leader is not meant to be a "hero" or direct agent of change, and the program does not take a cookie-cutter approach to formation. The idea is for the student, embedded in their own community, to help open up the space for diverse voices to be heard and new ideas to be contemplated. In this regard, students employ an action-reflection approach to help communities self-assess and iterate in striving to meet objectives.

The program continues to offer a unique curriculum, and the school is looking to redouble its marketing efforts to increase enrollment. The option for a dual degree with the MDiv in itself has not resulted in a noteworthy enrollment increase. One change that was implemented in the past was to reduce the fieldwork component from 10 units to 5 units in the program. This still enabled a sizeable fieldwork element for practical experience (20 hours/week) while mitigating issues of unpaid labor and making the time commitment more manageable.

Current students have noted that the program may be best suited for those with other professional credentials or who are making mid-career changes, rather than "new" students who may be challenged to be oriented in a community and may not know how to leverage this degree. In conversation with the committee, students expressed a desire for practical job skills and additional training in strategic planning, financial management, coalition building, etc. to accompany current coursework.

The committee noted that a degree program evaluation had taken place in the past few years. However, the report of this evaluation was lost as a result of staff transitions. While some tools have been, and continue to be, used for MASC assessment (exit surveys, placement data, and external review of projects), they have not been utilized in a systemic and sustained manner. In addition, an evaluation of

the degree's overall impacts beyond educational outcomes (i.e., admissions, enrollment and retention, finances, vocational placement, and otherwise) has not been undertaken to date. **Therefore, the committee recommends a report by the 1st of April 2026, regarding educational evaluation that engages appropriate stakeholders (e.g., faculty, students, finance, admissions and enrollment) and documents a simple, systematic, and sustained process of degree program evaluation that regularly gathers evidence related to each learning and degree program outcome (with a mixture of direct and indirect measures and quantitative and qualitative data). The report should include discussion of processes in place and results from evaluation conducted (see Standards 2.5-2.8, 4.5, and 4.9). The school is invited to consult the [Reflective Guide to Effective Evaluation for Theological Schools](#).**

5. Doctoral Degree Programs - None

6. Library and Information Services

Starr King has utilized the online library Digital Theological Library 2 (DTL 2) for the school's library services since Spring of 2020. DTL 2 is "a co-owned, born-digital library of religious and theological studies" with the mission "to provide its co-owning institutions with the highest quality digital resources...at the lowest possible costs." DTL 2 is available to students, faculty, and staff to access through Populi, the learning management system. Most faculty members also use additional local and national library resources for their research and SKSM can purchase GTU library cards for local students, faculty, and research scholars.

The DTL 2's purpose statement is "to supply digital library resources to not-for-profit educational institutions with religious studies as a core part of their mission." Although leaving GTU meant losing access to a large and established research library, it was unsustainable to help maintain the costs of such a library. The committee observed in various interviews that the faculty, students, and staff have adapted to the change and noted that they have the resources that they need through the DTL 2 for instruction and studies. As the school's use of the DTL 2 continues, it is encouraged to develop its own statement of purpose and role for library and information services (to which the DTL 2 contributes).

Additionally, faculty, students, and staff mentioned that in cases where items were not available, the DTL 2 library team was responsive in obtaining the requested items. SKSM has prioritized the acquisition of texts for courses, texts necessary to the formation of Unitarian Universalist students, and texts needed for faculty research. The evaluation committee reviewed the DTL 2 during the visit and found the services provided to be accessible and easily searchable. The students expressed appreciation for the easy access they have to materials, as well as the text-to-speech capabilities and audio book features. Faculty reported their satisfaction with the range and availability of scholarly journals. While some may miss the GTU library, they are overall satisfied with the DTL 2 collection.

The DTL 2 staff of credentialed librarians, a research librarian and an acquisition director, work closely with the academic dean and the coordinator of academic programs to support the educational work of the school. The library curates the collection as directed by SKSM faculty and is supervised by the academic dean to adequately resource courses.

There have been informal evaluations with ongoing conversations regarding the library services. Evaluating the DTL 2 research librarian is a part of the course evaluation process. Currently, there has

not been an official evaluation of the DTL 2 as the main provider of the school's library and information services, but a formal review is planned for spring 2026.

SKSM owns a unique and valuable collection of rare books that includes over 1,300 volumes that are currently stored in climate-controlled storage in Livermore, CA. This collection includes volumes from the early 16th century to 1967 and numerous works of Unitarian and Universalist history, many of which do not exist anywhere else. The Wilbur Rare Book Collection is in the process of being digitized by an archivist to enable broad access by scholars. The school also owns a collection of papers belonging to its namesake, the Rev. Thomas Starr King, which remain at the GTU library on permanent loan by SKSM.

Overall, the library has sufficient resources for the school's degree programs. DTL 2's online modality has enabled faculty and students across the country and world to access resources that meet their needs for teaching, learning, and scholarship.

7. Student Services

SKSM has a capable and qualified team of staff who provide a range of support services to meet students' needs. This team includes a dean of students, director of admissions and recruitment, registrar, director of digital learning, director of spiritual care, and student accounts manager (Self-study p 61). This team confers regularly, and the dean of students attends all faculty meetings where student concerns and issues pertaining to academic programs are discussed.

Admissions requirements and processes for the degree programs are located on the website, and applications for individuals without a baccalaureate degree are reviewed carefully and follow the same process as other applicants including a completed application with transcripts, individual interview, and final application review by the admissions committee. There is a published grievance policy in the student handbook. Staff reported to the committee that the policy has been utilized a few times in the past and the school has documented when a formal complaint has been initiated. No formal complaints were received during the most recent period of accreditation. Disputes or conflicts are encouraged to be addressed directly or through informal mediation processes, when possible, but if they cannot be resolved in these ways the formal process is initiated.

There is a lock and video recognition for security to gain access to the school's main office in Oakland, CA. The school has maintained digital student records since 2020, with documents from spring 2020 back to spring 2015 stored in locked cabinets in the registrar's office on site. Student records before this date are stored offsite around the corner from the office at a fireproof storage facility in waterproof, fireproof cases. Staff are aware of the wide range of risks that need to be covered in terms of records, particularly with digital records that are backed up on a daily basis by both Populi and Endsight (Standard 7.7).

SKSM maintains a commitment to awarding aid and scholarships to students in need and from marginalized backgrounds. While scholarship funds are described in school catalog, the evaluation committee observed that the eligibility requirements for each scholarship are not spelled out and communicated to students as clearly as students hoped. The evaluation committee observed that this has caused some confusion among students. **Therefore, the committee recommends that special attention be given during the next period of accreditation to demonstration of equitable, nondiscriminatory systems and processes for determining and communicating scholarships, financial**

aid, and implications of educational debt that are attentive to the duration of a student's enrollment, regularly reviewed by the school, and updated as needed (see Standards 7.8-9, 10.4). All students are required to undergo entrance counseling on loan debt and borrowing, as well as exit counseling upon withdrawal from the program or during their last semester of registration.

Career and placement support for UU students is particularly robust at SKSM as a result of denominational connections and resources. However, the director of contextual education and the director of the Chaplaincy concentration advise all students regarding vocational placements and requirements, based on the students' stated goals. The committee reviewed placement data, with 2023 being the last year of data provided. Placement rates increased overall from 2019 to 2023.

8. Faculty

Theological schools are communities of faith and learning dependent on a qualified, supported, and effective faculty of sufficient size and diversity to achieve a school's educational mission and support student learning and formation. SKSM possesses such a faculty, the bulk of whom hold both teaching and advising responsibilities. Given the small size of the core and advising faculty, a significant number of them also have administrative responsibilities such as directing certificate programs or overseeing contextual education. Even with these many roles, the faculty expressed to the committee energy, passion, commitment, and overall appreciation for their work and for the institution as a whole. Multiple religious traditions are represented among the faculty, and attention is given to racial/ethnic diversity. Faculty meet regularly to discuss both student concerns and curricular matters and to engage in professional development (i.e., study time).

Faculty workloads have been made more manageable with the creation of the director of spiritual services position. Student spiritual, emotional, and vocational advising and care have shifted to this individual, thus freeing the faculty to focus on registration advising and Threshold Assessments. Faculty expressed to the evaluation committee that this change is working well. The committee also reviewed faculty curriculum vitas and transcripts providing evidence of appropriate education, skills, and experiences for graduate theological education. All faculty (core, advising, adjunct, visiting, and research scholars) and their qualifications are listed on the SKSM website.

The evaluation committee recognizes the work of the dean of the faculty in advocating for increased compensation for faculty with the board of trustees and encourages the board to continue conversations in bringing salaries up to ATS median salaries when possible (see Standard 8.4). In other areas regarding support for teaching and advising, faculty expressed receiving sufficient and timely support, though the committee noted that some faculty were not aware of the institution's ability to pay for a GTU library card to support their scholarship and teaching, recognizing that they were satisfied overall with the Digital Theological Library's offerings.

The committee reviewed the faculty handbook and found it to be a thorough and helpful document outlining processes for clearly defining the roles and responsibilities of, recruiting, appointing, caring for, evaluating, promoting, and dismissing faculty (in Part 1). Freedom of inquiry is guaranteed in this section of the handbook, and the entirety of Part 1 is reviewed and revised on an annual basis. Part 2 of the handbook serves as an important guide for teaching and outlines academic policies and procedures that cultivate a consistent teaching environment for students.

In conversation with faculty, the evaluation committee observed that some faculty were not aware of available funds for professional development and conference attendance. Recognizing that funds have not been consistently budgeted and distributed to faculty, the committee encourages the institution to budget for such funds, inform faculty about their availability, and create a process for applying for and distributing funding (see Standard 8.7).

The faculty's role in student learning and formation is extensive and attends to the diversity of SKSM students religiously, interculturally, and in terms of learning and vocational needs (see Standard 3 report section). Students reported effectiveness in teaching and learning in meetings with the committee, as well as through course evaluations. The committee reviewed the scholarship and other projects of faculty and was impressed by the diverse array of contributions to their respective fields and broader publics. Faculty noted that the designation of Fridays as research and writing days was largely successful, though some reported that this was not always possible given the responsibilities of administrative roles and other work. The evaluation committee also acknowledged the diverse nature of how SKSM considers scholarship, and faculty expressed appreciation for sabbaticals and course releases to pursue specific research and projects. This included opportunities to engage with broader constituencies, including congregations, denominational entities, and community organizations and efforts. The committee encourages ongoing support and care on the part of the institution for the individual and collective vocations of its faculty (see Standard 8.11).

9. Governance and Administration

Starr King is a Unitarian Universalist identified seminary per its articles of incorporation and bylaws. The board exercises its authority as a group, through decisions made by the body as a whole and responsibilities assigned to its committees. The board appropriately uses the school mission to guide its decisions. The committee observed the excitement of the board when discussing the mission and how it has incorporated ECO practices into each meeting with time to reflect and discuss the mission.

There are currently twelve board members that are diverse in terms of race and gender. Trustees bring a range of qualifications in the areas of ministerial leadership, financial and business acumen, social change activism, and academic scholarship and administration. The school places special emphasis on recruiting individuals with demonstrated commitment to and leadership within Unitarian Universalism in order to maintain robust connections with the school's primary religious constituency. The board's ex officio positions (appointed by virtue of their office or by external election) are the Starr King president, dean of faculty, the chair of SKSM alumni association, and two student trustees (elected by their peers in overlapping terms). There are currently no faculty representatives beyond the dean of faculty, and faculty indicated during the committee's visit that they had written the board with a request for additional representation.

The evaluation committee reviewed the bylaws that describe the board's authority, responsibilities, composition, and governance processes. The board is currently setting priorities for the school through the Five-Year Roadmap strategic plan that was included in the self-study documents for review. The board has ensured that annual independent audits have been completed.

Regarding administrative leadership, there is a chief executive officer and chief academic officer, both of which are well-suited for their roles in terms of role and qualifications. There is no in-house chief financial officer. The school currently outsources the accounting and HR functions, and they are meeting the school's needs. However, during the visit, the committee learned that the school is considering

hiring a controller as the cost of outsourcing is not sustainable. The school's senior leadership will be undergoing changes over the next year, with the president retiring at the end of the current academic year. The board has already started communications to various constituents about the transition and, at the time of the visit, was completing the position announcement and compiling the search committee. Search committee members will include various constituents – student, staff, faculty, and other stewards. Given the pending change in presidential leadership, **the committee recommends that special attention be given during the next period of accreditation to the board's selection, care for, and evaluation of the school's chief executive officer (see Standard 9.3).**

The board has reactivated their development committee charged with recruitment and implementation of a new member orientation process. The committee observed in the interviews that the plan is to expand the search for members beyond the UU. The board has regular meetings four times per year, and previous meeting minutes were provided to and reviewed by the evaluation committee. The evaluation committee also reviewed the conflict of interest policy for board members. The board reiterated its intent for a standard process for self-evaluation in the self-study but has not implemented it at this time. The board is encouraged to implement standard processes for self-evaluation.

The faculty has the appropriate authority to oversee the school's academic affairs. The committee observed the faculty's enthusiasm for SKSM during the interviews. They work very closely with each other despite working from various locations. There is communication from the board to the faculty and vice versa through the dean of faculty, but the committee observed that the faculty seek avenues of direct input and engagement with board members. **Therefore, the committee recommends that special attention be given during the next period of accreditation to continued mutual engagement in developing a bond of trust among the board, administration, faculty, staff, and students, where shared governance is clearly defined and appropriately implemented, recognizing the appropriate roles among the board, administration, and faculty that leads to increased communication, understanding, and decision making that supports the school's educational quality and financial sustainability (see Standards 9 opening paragraph and 9.6-8).** The committee observed that mutual engagement efforts are present in many areas of the school and across various stakeholder groups and that these efforts should be extended to less mutually engaged areas and groups.

10. Institutional Resources

Starr King regards its dedicated staff as its greatest resource. Starr King currently has twenty-six faculty and staff. Eleven persons are solely administrative staff, seven are exclusively faculty, and five have combined roles. The number of personnel is comparable to schools of a similar size, albeit toward the lower end of the range. This is partly due to the outsourcing of several functions: namely, library services, IT services and cybersecurity, financial aid, and human resources. The committee observed in the interviews that the staff and faculty were adequately supported in their efforts to achieve the school's mission. The committee observed in the interviews the many testimonials of how faculty go above and beyond to make sure they have the necessary books and materials for their students, and that the staff work around the clock to respond to requests and provide alternatives based on student needs.

Currently, the finance, accounting, and human resources functions are outsourced to Dakin Ventures Consulting Group. This has provided the specialized skill necessary to maintain stable financial information and oversight of SKSM. The committee observed that the primary Dakin Ventures contact was referred to as a "thought partner" by the president, and it is evident that they work very closely

together with SKSM staff. The committee learned that the school does not consider permanent outsourcing of financial roles as financially sustainable, and there is plan in place to “off board” the consulting group to train in-house staff in the future, likely after the presidential transition.

It was apparent that most staff and faculty serve in a number of roles, with some individuals possessing upwards of three and four distinct roles at the institution. Nonetheless, morale is high; and the committee observed that faculty and staff were committed to the mission and enthusiastic about their roles. The one area for growth that echoed in interviews was the matter of fair compensation, as several interviewees indicated that salaries were not as adequate as desired, and that ongoing attention was needed in this area. **Therefore, the committee recommends that special attention be given during the next period of accreditation to adequate compensation and appropriate workloads for faculty and staff (see Standards 8.4 and 10.1).**

Starr King publishes and enforces personnel policies to ensure a safe, equitable, and productive environment for their board, faculty, staff, and students. The employee handbook was extensively revised and approved by the board in May 2023. The school has not made progress in creating updated job descriptions of every position as a basis for regular evaluations and is encouraged to do so.

The school has made great progress with the help of Dakin Ventures Consulting Group in leveraging the Financial Edge system to provide timely financial reports to the leadership of Starr King. The school prepares three-year annual budgets with input from department heads during the planning process. The budget is approved by the board. An independent audit has been conducted each year by Windes audit firm. The 2023 audit report expresses an unmodified opinion and there were no corrective actions in the auditor management letter.

The budgeted projections are optimistic, showing increases in tuition revenue and contributions while focusing on cost constraints to not increase expenses greatly after FY2025. However, based on past and present financial statements, there is still a concern that the current budget deficits are not sustainable. Actual expenses and revenues do not reflect a consistent pattern of surpluses over time. The school has only shown one year of surplus over the last ten years, which does not demonstrate financial stability. There have been efforts to address the financial challenges, but currently the student enrollment trend is declining. The strategic plan addresses the matter of increasing alternative revenue streams which take time to materialize. There is positive progress in fundraising showing the growth in contribution revenue, but it is not certain that the school will be able to increase revenue from \$2.4M projected in FY 2024 to \$3.5M in FY 2027. **Therefore, the committee recommends the school be placed on warning status because it is at risk of not meeting the following Standard(s): Standard 10.3 on Financial Resources: While the school has taken steps to shift its financial model and eliminate budget deficits, it remains at risk of not having sufficient and stable revenue streams and financial resources to achieve its mission with educational quality and financial sustainability. It must submit a report by the 1st of November 2027, regarding operating results that demonstrate a trajectory toward a consistent pattern of surpluses over time. The report should include the school’s plans for ensuring sufficient and stable financial resources to achieve its mission with educational quality and financial sustainability, the FY 2024-25 and FY 2025-26 audits and management letters (if available), the school’s analysis of its FY 2026-27 operating revenues and expenditures, and budget projections for FY 2027-28, FY 2028-29, and FY 2029-30 (see Standard 10.3).**

The school has increased the tuition rate from \$775 per credit to \$875 per credit in FY 2023 and then increased from \$875 per credit to \$925 per credit in FY 2024. There are no plans for additional increases currently. The self-study notes two foci of the scholarship strategy: 1) Awarding aid in proportion to

need and 2) addressing disparities through BIPOC targeted funds. The committee observed in interviews and in reviewing documentation that the criteria and processes for awarding scholarships are not clearly understood by or communicated to students. **Therefore, the committee recommends that special attention be given during the next period of accreditation to demonstration of equitable, nondiscriminatory systems and processes for determining and communicating scholarships, financial aid, and implications of educational debt that are attentive to the duration of a student's enrollment, regularly reviewed by the school, and updated as needed (see Standards 7.8-9, 10.4).**

The school has an advancement program that is appropriate to its mission and financial goals. The team is now fully staffed with a vice president of advancement, director of annual giving, and advancement assistant to continue the focus on raising funds. The advancement plan is clear and well structured, providing a solid plan for achieving fundraising goals. A \$9 million comprehensive campaign was launched publicly in 2023, with \$6.38 million raised and committed to date. The school hopes to make strides in its grant development efforts.

The school has access to the physical resources it needs to achieve the mission. Because SKSM is instructing students online only, office space is rented in downtown Oakland. The office space is used for local staff and includes a conference room for in-person and hybrid meetings, a kitchen, and a multipurpose room from which worship services are broadcast. The school has personalized the space to suit their needs effectively. Given that the school operates online, the current physical space is sufficient to support their operations. Most staff and faculty work from their homes, and large events such as the school's Symposium and commencement take place as hybrid events in a larger rental space. The committee observed in interviews from faculty, staff, and students that all systems and resources adequately meet their needs. They were especially grateful for the support from the HEERF grant to provide technological equipment to work from home.

Training is provided to faculty, staff, and students for the various applications and platforms that are used. They are provided with training guides that are updated each year. The committee observed in the interviews that there is a great emphasis on maintaining security and privacy for technological resources. SKSM contracts with Endsight for technology support. Endsight completes an annual audit on systems and controls. SKSM management is very open in these discussions on recommended improvement and security needs to ensure they are meeting all applicable laws and regulations.

Appendix: Requirements for U.S. Title IV Participants

Standard 1.6 requires that “any school that participates in US federal student aid programs meets all government regulations for those programs.” Those regulations are identified in the *Self-Study Ideas* for Standard 1.6 as well as the seven Standards listed below. Evaluation committees will review the self-study reports and supporting materials for every Title IV participant (whether the Commission or another agency is their Title IV gatekeeper) to ensure that the school addresses not only all applicable Standards, but also each of the following specific requirements. Schools embedded in a larger educational entity may rely on that entity for documentation for all items below, except the first one regarding course syllabi.

If the committee marks any item below as “does not meet,” the Evaluation Committee Report should describe what action the committee is recommending and why, with the recommendation included in Part II: Committee Recommendations, and in the narrative for that Standard in Part III: Committee Findings on the Standards.

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U.S. Title IV Documentation

1. Standard 3.2 on Academic Rigor

While every school must demonstrate academic rigor, a Title IV school must document how it meets the [federal definition of a credit hour](#) (34 CFR §600.2). To verify that it does, the school must provide to the evaluation committee a sampling of syllabi that represent all types of courses, course lengths, degree programs, and delivery modalities.

COMMITTEE RESPONSE: The committee has reviewed the documentation and determined the school *X meets* this requirement. A comment may appear below.

does not meet this requirement and a comment with recommended action appears below and in Part II and Part III of the committee report.

Comment: The committee has reviewed the school’s syllabi and finds they demonstrate adequate academic rigor.

2. Standard 3.11 on Educational Policies

While every school must have and follow the policies described in this Standard, a Title IV school must also demonstrate it has and follows a [satisfactory academic progress](#) policy (see CFR §668.34). The school must document the policies stated in Standard 3.11, including a satisfactory academic progress policy, and provide evidence that it follows its stated practices.

COMMITTEE RESPONSE: The committee has reviewed the documentation and determined the school *X meets* this requirement. A comment may appear below.

does not meet this requirement and a comment with recommended action appears below and in Part II and Part III of the committee report.

Comment: The committee has reviewed the evidence that the school presented and reviewed its operative Satisfactory Academic Progress (SAP) statement and other pertinent documentation.

3. Standard 3.12 on Transfer of Credit Policy

While every school must have and follow an appropriate transfer of credit policy, a Title IV school must also document any articulation agreements for transfer of credits with other accredited schools or any contracts with non-accredited entities to provide up to one-fourth of a degree.

COMMITTEE RESPONSE: The committee has reviewed the documentation and determined the school *X meets* this requirement. A comment may appear below.

does not meet this requirement and a comment with recommended action appears below and in Part II and Part III of the committee report.

Comment: The transfer of credit policy is on the school's website and in the student handbook.

4. Standard 7.5 on Student Safety

While every school must provide a safe environment for students, a Title IV school must also document that it meets the [Clery Act](#) disclosing campus crime statistics and security information through public posting of their annual security report due October 1 (see also the USDE's [campus security website](#)). If the school also has on-campus housing, the annual fire safety report must also be posted.

COMMITTEE RESPONSE: The committee has reviewed the documentation and determined the school *X meets* this requirement. A comment may appear below.

does not meet this requirement and a comment with recommended action appears below and in Part II and Part III of the committee report.

Comment: As a fully online seminary, SKSM is exempt from the Clery Act reporting. Before SKSM received notice of their exemption, they completed the Clery campus security survey each year and provided public notice of their Campus Safety and Security Report. The committee has inspected documentation of past compliance.

5. Standard 7.9 on Student Debt

While every school must regularly review student educational debt and develop strategies as needed to reduce debt, a Title IV school must also provide its most recent [US federal student loan cohort default rate](#) and its response to any excessive default rate.

COMMITTEE RESPONSE: The committee has reviewed the documentation and determined the school *X meets* this requirement. A comment may appear below.

does not meet this requirement and a comment with recommended action appears below and in Part II and Part III of the committee report.

Comment: The latest default rate submitted by the school was from academic year 2020. At that time, the cohort default rate was 0.

6. Standard 7.11 on Placement

While every school must monitor placement rates, a Title IV school that uses those rates for marketing or recruitment purposes (excluding its public statement of educational effectiveness, per Standard 2.8) must document that those rates have been verified by an external entity.

COMMITTEE RESPONSE: The committee has reviewed the documentation and determined the school *X meets* this requirement. A comment may appear below.

does not meet this requirement and a comment with recommended action appears below and in Part II and Part III of the committee report.

Comment: SKSM does not use placement rates for marketing or recruitment purposes.

7. Standard 10.7 on Financial Aid Audits

While every school must conduct an independent audit every year of its institutional finances, a Title IV school must also provide a copy of its most recent federal financial aid audit [for schools that exceed the \$750,000 minimum threshold] and its response to any findings. If the school has a [financial responsibility composite score](#) below 1.5, as determined by the US Department of Education (USDE), the school must provide a copy of that USDE letter and the school's response (e.g., posting a letter of credit, being subject to cash monitoring, etc.). Schools on [heightened cash monitoring](#) (HCM) are also required to submit a teach-out plan to the institutional accreditor serving as their Title IV gatekeeper. (Schools for which the Commission is gatekeeper should refer to *ATS Policies and Procedures* III.L.1-2.)

COMMITTEE RESPONSE:

The committee has reviewed the documentation and determined that the school:

X meets this requirement. A comment may appear below.

does not meet this requirement and a comment with recommended action appears below and in Part II and Part III of the committee report.

Comment: The school was placed on HCM status by the USDE due to a late audit submission. The ATS Board of Commissioners first issued notice to SKSM about the requirement to submit a teach-out plan in February 2024, and then rescinded this requirement in a subsequent communication in June 2024.