Response to the Task Force Report, from CLS, Edmonton

17 January 2011 (shortened version of the document sent to the BOD on December 23, 2010)

The faculty of Concordia Lutheran Seminary first of all thanks God and recognizes the effort and work of the Task Force for Cost-Efficient Seminary Education in LCC. It now contributes its own analysis of this Report.

On 23 December 2010 the president of Concordia Lutheran Seminary, Edmonton, sent a response to the Board of Directors of Lutheran Church–Canada, outlining the faculty's concerns about certain statements made in the Final Report of the Task Force on Cost-Efficient, Sustainable Seminary Education. This response focused on three areas which the seminary faculty believes need to be addressed. First is the question of **bias and inaccuracies**. The faculty believes that the tone of the document makes it appear that the financial situations in Edmonton and St. Catharines are equally in crisis. Second is the issue of **pastoral formation**. The Report focuses almost exclusively on course delivery, and gives only brief mention to other issues surrounding the formation of pastors, such as character development and pastoral skills, which can take place only with extensive personal contact. Third, the Report falls short in dealing with the **practical implications** involved in implementing its recommendations.

Concerning Bias and Inaccuracies

Throughout the Report, the overall picture of the "seminaries" of LCC lumps the two institutions together, presenting a grave picture. However, if one looks at the two schools separately (as must be done, because they are indeed separate institutions, with separate boards, faculties, curricula and budgets), it is clear that CLS is not in the same crisis.

Examples:

On page 6 the Report states that the accumulated operating deficit of the two seminaries of LCC stood at nearly $800,000 in 2008, neglecting to note (until appendix 1) that 90% of that was at St. Catharines, that the Edmonton deficit of $87,996 is being paid down quite rapidly, and that we actually operated at a profit in 2009-2010.

On page 10 the Report implies that donor support of the two seminaries is about the same. In fact, while CLTS reports about 500 donors in the last five years, at CLS the number of donors in each of the last five years is higher than the cumulative total at CLTS: 2004=2011 donors, 2005=1650, 2006=1498, 2007=1417, 2008=1325. (We do need to note concerns that the number of donors is decreasing year by year, and a strategy is needed to increase that number.)

Regarding information on page 11, support from "donations" at Edmonton covers 43% of income, and in 2009-2010 this amounted to $523,155. This is substantially greater than that of CLTS, which notes 35% and $158,068, from "gifts", respectively.

While it is true (from page 11) that operations in four of the last five years have resulted in

deficits, it should be noted that the four deficit years were the first four in the cycle, and that the fifth year resulted in a surplus. It also fails to note that prior to this time span the seminary had several years of operating at a surplus, and that the operating deficit is being substantially reduced because of that fifth year surplus. The first years of this five year cycle were the years of the worldwide financial crisis and included one year in which there were no endowment earnings available for CLS's use. CLS is having its struggles (as is every seminary in North America the last few years), but is by no means in a crisis situation.

Regarding the geographical diversity of our donors, the Report (page 25) states, "The majority of the seminary's gifts have come from individuals in the A-BC District." Not so! The table on page10 shows that 6,503 people who lived outside the ABC District supported CLS during the years shown (2000-2008), compared to 6,399 inside the ABC District. A fairer conclusion would be that CLS' support is actually very diverse, drawing upon a large number of people within its nearest constituency (the ABC District) but also enjoying tremendous support from the Central District, and significant support farther east and south.

So also (page 12), the value of CLS's endowment is not reported. For that matter, neither is CLTS's, other than in the appendix. The result of omitting this material in the case of both schools is to downplay the significant differences between them. On page 18 the endowments of the two seminaries are not placed side by side, which would show that endowment fund contributions at CLS have been 12.4 times greater than at CLTS. It should also be noted that CLTS endowments have also been increasing.

Enrolment is an issue. However, we do need to note that CLTS's numbers do include a number of students from the LCMS, due to its proximity to the U.S. border. The two schools together prepare about the same number of candidates yearly for LCC. Due to the small size of LCC and of the seminaries, enrolment does fluctuate widely, with small classes and larger classes standing side by side. This demonstrates a need for a comprehensive recruitment strategy, not a need for panic.

The comment on page19, "Money follows mission: if the constituency of LCC has lost confidence in either or both of its seminaries, then financial support, or more precisely the lack thereof, will surely reflect that perception" seems to imply a problem at both seminaries. In fact, money does follow mission to CLS.

The claim on page 25, "The situation in Edmonton, while different in particular, is essentially the same as that in St. Catharines," is misleading. With respect to real estate, the situations between the two schools are not "the same." There are two factors at CLS which are completely different, resulting in an entirely different conclusion. Factor 1: CLS's land is wholly owned; Factor 2: CLS's land is owned by the ABC District of LCC; thus, CLS's real-estate situation is utterly stable for the long term, with no debt and no prospect of losing control of the property or any of its assets.

On pages 28-29, the discussion about the possibility of merging "some or all seminary programs" with CUCA blends together both of those possibilities in a less than careful way. Some of the difficulties the report foresees (e.g. the amount of funding available from LCC, page 28) would come into play if both seminaries merge with CUCA. But other difficulties

(e.g. an increase in "educational distance" between the two seminaries, page 29) would apply only if just one seminary merged with CUCA. This blending of two distinct scenarios into one scenario is at least partly responsible for the unappealing verdict the report renders on the entire prospect of a merger with CUCA. Keeping the two forms of this proposal distinct might help to cast them both in a more positive light.

On page 32, the comment about CLTS's salary cuts (and CLS's lack of the same) does not indicate why CLS chose a different path. CLS and CLTS never agreed (nor had to agree) about salary levelling. Neither did the two seminaries agree in having the same kind of services and staff in order to carry out their own responsibilities in their places. CLS did not undergo salary cuts – although it froze salaries for the last two years – but managed to make other cuts without "cutting in people's flesh." It is the president's foremost concern that the people working at CLS don't suffer personally because of a temporary crisis, if that crisis can be dealt with in a reasonable and timely manner otherwise.

In examining options regarding merger of the seminaries, statements are made which show that no actual research has been done. The statements on page 33 seems to indicate that no one has actually contacted the province of Ontario or Brock University to seek answers regarding degree granting, and regarding CLTS's tenuous relationship with Brock University.

On pages 37and following, the Report expresses concern about "a limited amount of curriculum" being delivered by distance, and states that "it remains unclear" why this is not taking place "to a greater extent." It needs to be acknowledged that CLS has actually done quite well in offering a relatively large number of courses on-line, especially considering the human resources that are required to do so, and has done so in a relatively short amount of time (see APPENDIX 1). This was not done sooner because we have only recently had stability in the office of president, for instance. This also affected the faculty's workload and the ability to develop new programs and direction. In addition to now developing our distance education offerings, we also successfully completed a curriculum review, something that has long been desired but never came to fruition until recently.

Regarding "a greater extent": as this section (pages37-38) makes clear, this Report is actually calling for *all* courses to be offered on-line. There is, however, no discussion at all of the pedagogical, administrative, and financial reasons why this may not, in fact, be a good idea.

Regarding "it remains unclear": as noted in the section on formation (see below), CLS has been quite clear – at least internally – about why more curriculum has not been offered on-line thus far, and why there are no plans to offer on-line anywhere near the number of courses this Report calls for (i.e., 100%). Whereas ATS allows for far more on-line courses, CLS has established the limit – for good reasons, stated further down – to only 1/3, all in the first year of the M.Div program. But CLS has not been *asked* why we were not planning to offer more on-line courses.

On page 40, the Report mentions the distance education model at Luther Seminary in St. Paul, MN. Surely this pilot project is informative, but the report makes no mention of the

five staff in the IT department and the twelve staff in the Student Services department at that seminary.

Concerning Formation

It is our unanimous understanding that overall, the Report focuses so much on quantifiable "hard data" that a proper appreciation of the value of *formation,* rather than simply the delivery of academic courses, is sorely lacking.

For example, meagre attention is paid in this Report to "student services." There are only three places that student life, spirituality, and personal formation are mentioned.

CLS concerns itself extensively with personal formation. First-year students at CLS are required, for instance, to formulate a "Personal Growth Plan" after they have received input from a number of sources. Furthermore, CLS expends a great deal of energy, time, and money nurturing and supporting students' personal skills. Counselling is arranged, and subsidized, for students who need it. Referrals and subsidy are provided for students who have speech impediments or similar issues. Efforts are made to arrange workshops and "co-curricular unit" opportunities in many social- and personal-growth areas, many of which are tied to individual students' pressing needs. Because of careful monitoring, CLS students who fail to graduate or be recommended for placement into LCC's *ministerium* rarely do so for academic reasons. Rather, it is almost always because of an emerging recognition, over time, that a student is personally unsuited for the pastoral office. Our experience indicates that the Report is simply wrong in its assertion that many student services can be handled "quite well" over the Internet (page 41). We disagree, and believe that to do so would be disastrous. Thus, the Report as a whole seems neither to recognize nor to appreciate the extremely high value that CLS places upon its mission as student *formation*, not merely student "training".

Contextual reasons to take "formation" more seriously

If anything, the thorough formation of pastoral candidates is more important now than ever. There are several reasons why this is so. Four in particular are: 1) the widespread breakdown of the family, including among people in LCC congregations, means that a student needs to learn and grow in a relational setting, especially if he comes from a fractured family; 2) the widespread decline of biblical illiteracy suggests that seminary students need more, not less, grounding in the basics of the faith than their predecessors did; 3) it is more and more common for prospective seminarians to be novices in the Lutheran faith, which means we need to pay more, not less, attention to student formation; 4) the Internet may actually isolate people from one another, rather than fostering real relationships, which is a necessary skill needed for real ministry.

Formation and distance education

The Report's urging the seminaries to move to a greater amount of distance education (basically, in their proposed structure, everything is to be done by distance for at least some of the participants in every single class), fails to recognize that true pastoral formation

cannot happen at a distance. One significant recent work, *Educating Clergy,* is very clear that pastoral formation includes three "apprenticeships." Pastoral students need to grow in cognitive, skill, and personal formation (*Educating Clergy,* 31). Precisely because it *is* personal, the last of these formations takes place most effectively in the context of community – face-to-face, day-in-and-day-out relationships.

It is significant, in this perspective, that the report argues for the adoption of a model of distance education that is modelled on examples such as Luther Seminary-St. Paul and the Institute of Lutheran Theology (pages 40-41), as already mentioned above. On the one hand, these programs are touted in this report because they require so little on-campus, face-to-face time. On the other hand, both schools implicitly recognize the importance of that which the Report explicitly denies, by requiring students to attend a certain number of intensive courses on campus. If face-to-face time in physical proximity to one's instructors and peers is not important, why are students required to take time off work and travel to a common location for a short period of time, several times a year? The obvious answer is that these programs' administrators do recognize, at some level, the importance of a face-to-face, formative community. For a clear picture about seminaries similar in size to CLS, as opposed to Luther Seminary, please see APPENDIX 1.

 It should be noted, too, when CLS did its curriculum review in 2007-2008, the faculty declined to allow students to take more than one year's worth of classes before moving to Edmonton and joining the seminary community – here being much stricter than ATS standards – because of its very real concern for formation, not merely for training or academic education. A very good case would have to be made to overturn what seems to be the fairly obvious wisdom of this requirement. The Report does not make its case.

In sum, on page 35 it is asserted, "The Task Force believes by integration of operations and curriculum it will be possible to maintain high quality pastoral formation in LCC."
 However, nowhere is it defined what "high quality pastoral formation" would look like.
 On page 40, there is consideration of the spiritual formation of students in a "distributed learning model", taking place through work in the student's congregation, but that is the only aspect of formation considered.

An equally troubling question in relation to the recommendation for the development of distributed learning in particular is that of responsibility for formation. In such a model, the seminary is responsible for instruction but pastoral formation practically becomes the primarily responsibility of the pastor of the congregation to which the student belongs. While a distributed learning model can be more convenient for the student, it places a great burden upon the pastor which he must bear alone, not to mention the difficult situation in which he may find himself when he must in good conscience speak against a candidate's qualifications for the office of ministry, while at the same time trying to care for him pastorally.

If the responsibility to oversee formation lies with the seminaries, then physical presence in the seminary community is required for the majority of the program. This is not just supported by intuition and anecdotal evidence, but by studies conducted in the area of pastoral formation.

The work of pastoral formation entrusted to one pastor, in addition, becomes greatly impoverished in comparison to the communal work of formation on campus. Although pastoral formation is the responsibility ultimately of the faculty, it could be said that on campus it becomes the work of the whole church. Students also have the benefit of observing and relating to not just one pastor through the course of their formation but in addition to the pastor of their home congregation they get to know a local parish pastor in their field education, the supervising pastor for their vicarage, and visiting pastors who preach for chapel services. In all of these they may find mentors of different personalities and temperaments which can become models to them for pastoral ministry.

Concerning Practical Issues

The issues here particularly involve the areas of faculty teaching load, finances (in terms of a real cost analysis of the proposed program), and accreditation.

Faculty teaching load

The proposal to have a total of five professors in two places is simply unworkable when one looks at the required teaching and administrative loads necessary to maintain a quality program. (The program proposed is in fact not a quality program, but a bare-bones program.) The Report's proposal mandates "four to five courses per academic term"(on page 35), or "four to five credit course assignments per academic year" (page 36). Which is it? Given the extra time demands that come along with 1) distance education, and 2) co-ordinating administrative matters between two campuses, it is hard to see how faculty could be expected to teach four to five courses per semester. Also, would this expectation apply to the president, who is often referred to as if he is "merely" another faculty member like all the others?

Currently a full teaching load consists of three three-credit courses per semester. A shift to the recommended model represents an increased teaching load (particularly with the distance component added) and administrative load. This would effectively curtail any activities beyond academic teaching. Yet one professor, documenting the distribution of his own time over a semester, noted that support activities (administration and accompanying tasks) occupied 44% of his time!

On page 24 the Report does acknowledge that continuing education and extension activities are part of the mandate of Synod. Article III of the Constitution of LCC notes that one of the objectives of Synod is to "recruit and train pastors, deacons, and other professional church workers and *provide opportunity for their continuing growth"* (emphasis added). Though the continuing education aspect is quoted from Article III, any discussion of this mandate is completely missing from the Report. There is not even an acknowledgement as to how this has been done in the past. So also the contribution of LCC professors to the mission work of Synod in preparing pastors in Ukraine, Nicaragua, and Southeast Asia is acknowledged (page 4), but there is no discussion at all as to how this work can be maintained with a drastically reduced faculty. LCC's leadership in world Lutheranism, as well as the quality of

theological education for our own pastors and other church workers, would be severely diminished by reducing faculty numbers.

Financial Issues

The Report clearly has not fully enumerated the financial costs of moving to this form of learning. To establish and maintain a program of distance education, or one seminary on two sites under any situation, is quite expensive, and the Report has not taken many of these costs into consideration. The proposal ignores the fact that there will still need to be extensive duplication of administrative services by the faculty in order for this to work. It also ignores the fact that to do distance education properly requires a dean or director of distance education along with a full-time IT person at each place to keep the technology running while courses are being taught.

The Report also makes unwarranted assumptions about the relationships between Brock and CLTS and between CLS and CUCA. It is inaccurate to call Brock University and CUCA "sister institutions" and to imply thereby that CLTS and CLS would have easy access to their resources (facilities and personnel). Formal agreements would have to be negotiated with both schools, both for access to their "smart classrooms" and for the personnel support necessary to make them work. Because the report envisions these classrooms being used for many hours every week, both costs – facility rental plus staff support – are likely to be high. Even more, this proposal presupposes that Brock and CUCA would be in a position to let CLTS and CLS use their facilities for many hours per week. Because Brock and CUCA are, in both cases, vastly bigger than CLTS and CLS, their own programs are likely to require the lion's share of the room's (and personnel's) availability. This is quite apart from the fact that Brock and CUCA could already claim priority of use simply on the basis of their *ownership* of those facilities.

The time involved in developing distance education courses has not been adequately considered, either. Continuing to offer courses as CLS has done for several years already would not represent a huge further investment of time. For those courses, the work is already done, and, more to the point, they do not utilize many asynchronous components, or other features that are extremely demanding of instructors' time (both for development and for implementation). However, moving more fully into a more advanced form of distance education would require massive investments of faculty time. In fact, it is hard to imagine how this could even be done, without at least one faculty member on each campus having the benefit of purposeful training in this specialized field - training which would, in itself, require a significant investment of time and money.

At CLS our preparation for entering into this project was as much as we could manage, but even at that has been a "learn by experience" approach. We benefited from our agreement with the ILT for advice on purchasing equipment and for training. Funding and time allotted for faculty development is necessary in order to effectively and efficiently teach by distance. The issue of a deployed learning model is something else to be considered when counting the costs. There are pedagogical issues as well as issues of curricular design which would need to be developed.

Currently CLS has no one in its faculty or staff who has the education to design or implement such a system of delivery. Institutions who are offering this type of delivery operate with departments overseen by directors or deans of distance education who have earned doctorates in that field.

ATS & accreditation

The Report recognizes the value of ATS accreditation on page 36. However, it does not seem to take into account the cost (dollars + time) of ensuring that accreditation could be maintained throughout the course of implementing its proposals. Especially in light of the very high cost (dollars + time) of implementing the changes themselves, it is questionable whether the reduced level of staffing that this report foresees could muster the resources to satisfy ATS's concerns. And even if so, it seems reasonable to expect a significant "downgrading" of CLS' s accreditation as a result of these changes, if not its complete loss. ATS has sent to CLS – which has forwarded it to the BOD – an opinion about the Task Force`s report and some answers to the questions we attached to it.

It is significant that ATS would have a grave problem with the suggested governance model, which would allow the synodical Board of Directors to overturn decisions of the seminary's (seminaries') Board of Regents. The Report recognizes that "The Board of Regents are [*sic*] responsible for the ultimate control of the seminary programs and expenditures on the advice of the seminary president." Why then does the Report ask the synod's Board of Directors to become much more involved in budgetary matters? The synodical bylaws cited on page 43 say that the BoD "shall periodically review the institutional policies, programmes, and curricula" of each seminary. Extending the BoD's mandate from the review of academic and administrative matters into the realm of finance, is quite a leap. Further, the suggestion that the BoD could or should actively "'object' to either the capital or operating budget of the Board of Regents," and even "propose changes to budgets" (page 44) -is surely an undesired extension of the BoD's oversight. ATS's reaction and caution confirms this.

So the governance suggestions are troubling. Allowing the Board of Directors to modify the budget and set policy which contradicts the Board of Regents would be a real problem. If the seminary (seminaries) can operate with a balanced budget even with a reduction in funding from Synod, the BoD should simply rejoice and let the seminaries continue on. The Board(s) of Regents are fully capable of holding the institution(s) accountable.

Finance issues in Appendix 1 (pp.47-48):

It is troubling that the Report (page 39) calls for "very detailed budgets" to be formulated by the combined seminary it envisions while itself lacking such detail. The following questions probe only the most obvious places where the Report's own "budget" is lacking in detail and also in rationale and explanation.

As the appendix stands, we question many of the projections put forward, because there is

no evidence for such things as a projected drop of 21% in both seminaries' combined gift income ($166,223) between 2009-10 and 2010-11, or a tuition income projected drop by 3.7% ($9,144) in 2010-11 compared to 2009-10. Further, the Report's proposed reduction in salaries & benefits of $222,474 (an 18% reduction) fails to factor in the *increased* staff costs associated with the two-campus plan, with additional IT staff and travel especially not taken into account.

This Report projects a net saving of $186,857 in 2010-2011 compared to 2009-2010 – a reduction of 11.3%. Considering the enormous *non-economic* costs that all of these changes would create, is this proposal really "worth it"? True, every dollar saved is important. But to save merely 11.3% of current expenditures, is this level of disruption really warranted?

If not, there are two possible conclusions:

1) If the cost-benefit ratio isn't worth it, the synod would be better off to maintain the status quo ; or, 2) If the cost-benefit ratio of the present proposal isn't worth it, consider other options stated and not enough explored.

We believe that one corporation with one name and mission, is beneficial and feasible, with one board and one president/CEO. The dean of the other campus would not have the same activities nor responsibilities as the president/CEO, but the latter would be responsible for a centralized, overall management, whereas the dean/provost would be responsible for the good operations of his campus. A single corporation with one name would have the advantages of focusing a single effort for support with prayers and donations in the synod, a single effort in outreach for the church, and the benefits of the triangular activity of *teaching, research and extension*. But we would have to ensure at least four faculty members on each campus! To do this, of course, would necessitate a massive stewardship education program. The seminaries "problem" is not an isolated institutional problem, but it is a problem in relation to the church to which it belongs. It is true that the donor base is aging, and that the "younger generation" has not adopted a culture of giving, and that reality needs to be confronted. It is also true that seminary education, in the long run, is really not that expensive, running at about $25-$30 per year per baptized member.

We see truth in one "anecdotal" comment:

"In the present circumstances that face our seminaries, it seems that financial concerns are uppermost. But they are only a symptom of the problem, not the problem itself. The symptoms are also of a temporary nature. For most of its history, CLS has operated in the black. In the early years of its history, CLTS gathered endowment funds far beyond what could have been reasonably expected. The supporting constituencies may be withholding support, but that can be reversed. I do not agree with the "whereas" in the convention resolution which stated, 'the synod is unable to materially increase its financial support for operating the two seminaries.' Since 'synod' means all the pastors, deacons and congregation, I contend that the synod is not 'unable.' It is currently 'unwilling.'" (page 21)

In our opinion, the issue is a failure of will. Our church is becoming increasingly timid, unwilling to make bold moves in honour of the Gospel. The financial setbacks were of a

temporary nature, and at least in CLS's case came from a change in development directors (it takes time to renew trust) and presidency and the major worldwide economic downturn. In our view the resolution creating the task force was a panic reaction to find a "permanent solution to a temporary problem," as someone said. We surely need a positive resolution to encourage stewardship education, recruitment, and financial support of the seminaries. But this would require that the Report bring a concrete plan for a change in the LCC culture regarding its relation to the seminaries: the creation of a concrete **program**, an *ad hoc* committee that would set up such a program, with resource materials, teaching aids for pastors and congregations. a program for **recruitment and fundraising for the LCC formation of pastors in its seminaries.**

Conclusion

We do believe that the Report's proposal does not adequately considered the options available to us within the current two-seminary system to improve income and rectify costs without affecting greatly the quality of education and pastoral formation. We are willing and able to work with the Board of Directors in formulating a plan that will ensure strong seminaries, high quality teaching, and sufficient classes of pastoral graduates to serve the needs of the church.

Respectfully submitted,

Dr. Edward Kettner (final redactor)
On behalf of Dr. Manfred Zeuch and the faculty of Concordia Lutheran Seminary, Edmonton, Alberta

APPENDIX 1

On request, the IT Director of the ATS (Association of Theological Schools) provided CLS with a list of accredited seminaries that meet the follow two criteria:
1. **5 or less full time faculty members**
2. **50 or less students**

This list shows the smallest 5% of the accredited seminaries in North America, based on 2009/2010 data.

Name	Faculty		Enrollment		Notes
	Full Time	Full Time Equivalent	Head Count	Full Time Equivalent	
Montreal School of Theology	0	1	49	44	Despite being a school of a much larger university (McGill) and all of the resources that come with that relationship, MST **does not offer** a distance-based program in Pastoral Formation.
Toronto School of Theology	1	1	0	0	Despite being a school of a much larger university (UofT) and all of the resources that come with that relationship, MST **does not offer** a distance-based program in Pastoral Formation.
Bexley Hall Seminary	2	4	17	14	**Does not offer** any distance or online assisted learning opportunities in Pastoral Formation.
Queen's College Faculty of Theology	2	6	48	24	Based on its formal status as an Affiliated College of Memorial University of Newfoundland, Queen's College has access to shared resources in many administrative departments. Even so, their Bachelor of Theology by Distance is still limited to students over the age of 35, who have already completed 10 on-site courses (Associate of Theology program), and requires one additional year of full time study on-site. (http://www.mun.ca/queens/bthdistance.html)
Byzantine Catholic Seminary of SS. Cyril and Methodius	3	8	11	10	Despite a formal relationship with the much larger university (DuQuesne University) and its broad online-learning program, BCS **does not offer** a distance-based program in Pastoral Formation.
Concordia Lutheran Seminary (AB)	3	4	21	17	Allows up to 1/3 of program to be taken via synchronous distance education.
Christian Witness Theological Seminary	3	7	47	25	**Does not offer** any distance or online assisted learning opportunities in Pastoral Formation.
Concordia Lutheran Theological Seminary (ON)	4	6	28	26	**Does not offer** any distance or online assisted learning opportunities in Pastoral Formation.
St. Andrew's College	4	5	35	21	In association with two other theological colleges forms the Saskatoon Theological Union on the University of Saskatoon campus, and all three schools have formal and active relationships with the UofS. SAC is beginning to supplement their traditional program with some Distance courses. Five courses are planned to be offered in the 2010/2011 year, pending minimum registration. Three courses are currently planned for the 2011/2012 school year. The Distance program is shared by the administration and faculty of all three colleges.
Urshan Graduate School of Theology	4	5	38	28	Urshan has the most robust Distance Education program - fully 50% of their program can be completed online (http://urshan.ccsct.com/page.cfm?p=144), unless of course you want an MDiv, which is their only program that **does not offer** a

				distance component.
Mid-America Reformed Seminary	5	6	19	18	**Does not offer** any distance or online assisted learning opportunities in Pastoral Formation.
Lutheran Theological Seminary (SK)	5	6	38	21	See St. Andrew's College, above.

Observations:
1. 8 of the 12 schools **do not offer** a distance or online-learning opportunity in Pastoral Formation.
2. 3 of those 8 schools, despite a formal and practical relationship with much larger universities (and access to larger institutional resources), still do not offer distance or online-learning opportunities in Pastoral Formation.
3. 1 of the 12 schools offers a **very limited** distance program that is bookended between years of on-site learning.
4. 2 of the 12 schools shared faculty with yet another small school to offer a mere 5 distance-enabled courses in the current academic year.
5. 1 of the 12 schools allows up to 1/3 of its program, mainly the first year, to be taken by synchronous-online-learning. That school is **Concordia Lutheran Seminary**.

APPENDIX 2

A compilation of standards from the ATS Standards for Accreditation relating to Distance Education.

General Institutional Standards

6.2 Faculty role in teaching

6.2.3 Full- and part-time faculty should be afforded opportunities to enhance teaching skills, including the use of educational technology as well as training in instructional design and in modes of advisement appropriate to distance programs, as a regular component of faculty development.

10 Multiple locations and distance education[2]

In order to meet the needs of their constituencies, theological schools may develop programs by which students may earn graduate credit for courses completed away from the institution's primary location. Programs of this nature shall be offered in ways that ensure that courses that yield graduate credit maintain the educational integrity of post-baccalaureate study, **that students receive academic support and essential services, that the formational components of theological education are effectively present**, and that proper attention is given to the general institutional standards of the Commission and those for individual degree programs.

10.3 Distance education

10.3.1 Definition

Distance education is defined, for the purpose of this standard, as a mode of education in which major components of the program, including course work, occur when students and instructors are not in the same location. Instruction may be synchronous or asynchronous and usually encompasses the use of a wide range of technologies.

10.3.2 Planning and evaluation

10.3.2.1 The purposes for which an institution offers distance education programs shall guide its planning and evaluation procedures and its decisions regarding such programs.

10.3.2.2 Planning for distance education programs shall be fully integrated into the comprehensive institutional planning initiatives. Persons knowledgeable about and active in distance education should be involved in the institutional

planning process.

10.3.2.3 Evaluation is a critical element in support of a program's educational integrity and in revising and strengthening an institution's distance education programs. Institutions shall develop and implement ongoing evaluation procedures

for distance education programs that involve appropriate groups of people in the evaluation process. Evaluation of distance education programs is a process that includes (1) the identification of desired goals or outcomes for the program, (2) a system of gathering quantitative and/or qualitative information related to the desired goals, (3) assessment of the performance of the program, and (4) the establishment of revised goals or outcomes based on the assessment.

10.3.3 Educational qualities

10.3.3.1 Degree programs that include distance education shall seek to ensure that the learning goals of graduate education characterize the program, that teaching and learning contribute to the formation and knowledge of religious leaders, and that the school is utilizing its resources in ways that most effectively accomplish its purpose. Schools shall demonstrate how programs offered through the mode of distance education seek to meet the standards of [curriculum,]* learning, teaching, and research described in Standard 3; requirements regarding library and information resources outlined in Standard 5; and the provisions for faculty control, involvement, and development described in Standard 6.

> * The original text read: "seek to meet the standards of learning, teaching, and research described in Standard 3; the goals of the theological curriculum addressed in Standard 4 . . ." Please see footnote 1 on page 83 regarding the renumbering of Standards 3 and 4.

10.3.3.2 Schools using distance education shall be intentional in addressing matters of coherence, educational values, and patterns of interactions among all courses offered within the program. Institutions shall guard against allowing the accumulation of distance education courses to constitute a significant portion of a degree program that lacks coherence, intentionality, and curricular design and shall develop a system that monitors the number of distance education courses in a student's program of studies.

10.3.3.3 Programs of distance education shall demonstrate the collaborative nature and research dimensions of theological scholarship that foster critical thinking skills. According to the degree program requirements, distance education programs shall seek to enhance personal and spiritual formation appropriate to the school's mission and ecclesiastical tradition and identity, be sensitive to individual learning styles, and recognize diversity within the community of learners. Courses shall provide sufficient interaction between teachers and learners and among learners to ensure a community of learning and to promote global awareness and sensitivity to local settings.

10.3.3.4 The development and review of courses shall be a collaborative effort among faculty, librarians, technical support staff, and students, showing sensitivity to ministry settings and the goals of the entire curriculum.

10.3.4 Teaching, learning, and curriculum

10.3.4.1 Programs of study and course curricula for distance education programs shall be established, approved, and reviewed by the regular institutional policies and procedures regarding content, methods of instruction, new and emerging technologies, and standards and procedures of evaluation.

10.3.4.2 Requirements with regard to completion of degrees, curricular and instructional design, and outcomes shall reflect the expectations of the degree program standards to which the courses are credited. Residency requirements shall conform to those specified in the Commission standards for the degree programs to which distance education course work is credited.

10.3.4.3 Institutions shall ensure that distance education programs provide appropriate opportunity for collaboration, personal development, interaction among peers within a community of learning, and supervised field or internship opportunities when appropriate to the degree program.

10.3.4.4 When a school contracts for educational services from another agency, the school is responsible for the academic quality and integrity of all such educational services provided by the other agency.

10.3.5 Library and information resources

10.3.5.1 Typically distance education programs combine access to campus libraries with electronic access to digital resources. Library and other information resources shall be available in such number and quality as needed to achieve the purposes of the curriculum, and the institution shall demonstrate that students are required to make appropriate use of these resources. Programs shall provide sufficient library and research capabilities for theological scholarship, access to professional research librarians by both faculty and learners, and instruction by library staff to ensure discerning evaluation by the students of resources available.

10.3.5.2 When libraries of other institutions are used to meet the needs of distance education programs, the Commission member school shall have written agreements with those libraries to ensure that they offer the functional availability and adequacy of resources and facilities.

10.3.6 Technological and support services

10.3.6.1 Sufficient technical support services shall ensure that faculty are freed to focus upon their central tasks of teaching and facilitating learning. Support services shall create systems for faculty development and assistance to ensure consistent, effective, and timely support that includes course development, training, implementation of the programs, and troubleshooting.

10.3.6.2 Timely technological support services include (1) staff with a sufficiently high level of technical skills to ensure student facility in handling software and the technological aspects of course offerings and (2) the systemic evaluation and upgrading of technological resources and services consistent with the learning goals of theological scholarship.

10.3.6.3 A technological and support services program shall include technological training from basic to advanced and from one-on-one assistance to group instruction and shall ensure an adequate ratio of support services personnel to faculty and students. The program shall also ensure that the educational objectives are not hindered by time delays in support services or the lack of capable personnel to ensure the several bridging functions between technology and theological education, between theological curriculum and delivery systems, between teachers and learners, and between the distance education program and the goals of the overall curriculum for the courses and degree program being offered.

10.3.7 Faculty

10.3.7.1 The variety and diversity of the faculty shall be appropriate to the specific program, and a sufficient number of full-time faculty shall be available to provide leadership.

10.3.7.2 Procedures that govern personnel for the total institution shall be used for selection of faculty in distance education. Faculty must possess requisite credentials, demonstrate competence appropriate to the specific purposes of these instructional programs, and benefit from institutional practices regarding scholarly development and support for faculty research. Institutions shall provide regular and formal procedures for evaluating faculty engaged in distance education.

10.3.7.3 The institution's full-time faculty shall have significant participation in and responsibility for academic development, teaching, and oversight of distance education. They shall ensure that the institution's goals and ethos are evident, the program is rigorous, and the instruction is of a high quality.

10.3.7.4 Institutions shall offer faculty (including adjuncts) ample training in the use of technology, as well as tutelage in instructional design (e.g., developing new courses, revising current ones, and devising pedagogical strategies) and in modes of advisement appropriate to distance programs.

10.3.7.5 Institutions shall have a regular and formal procedure to monitor teaching and scholarly activities related to distance education programs as well as faculty workloads.

10.3.7.6 Adjunct and part-time faculty should have appropriate access to the administrative structures of the employing institution. They should receive a thorough orientation to the purposes of the institution and to its particular distance education programs.

10.3.8 Admissions and student services

10.3.8.1 In recruitment efforts, services, and publications, institutions shall accurately represent their distance education programs, including but not limited to, a description of the technology used and the technological ability, skill, and access needed to participate in the program satisfactorily.

10.3.8.2 Admission requirements for students in distance education programs shall conform to appropriate degree program standards of the Commission. The institution shall ensure effective admission procedures and appropriate control.

10.3.8.3 Admission requirements shall effectively inform students regarding the necessary skills and mastery of technology to participate fully in the distance education programs to which they are admitted.

10.3.8.4 Students in distance education programs shall have access to appropriate services including advisory and administrative support, technological support, program and vocational counseling, financial aid, academic records, and placement. The policies and procedures governing financial assistance shall be published and administered equitably.

10.3.9 Administration, governance, and finance

10.3.9.1 Distance education programs shall have appropriate structures and administrative procedures that are well defined, published, and clearly understood by all units of the institution. The administration of such programs shall be fully integrated into the institution's regular policies and procedures.

10.3.9.2 Institutions establishing distance education programs shall ensure that institutional authority and governance policies and procedures have been followed. The collegial aspects of shared governance, including initiation, review, approval, implementation, and evaluation, shall be followed.

10.3.9.3 Institutions shall provide adequate financial resources to ensure the educational quality of distance education programs and shall maintain appropriate fiscal responsibility for the programs.

10.4 Approval process

10.4.1 Multiple locations and distance education programs require the approval by the board as outlined in the Commission's "Procedures Related to Accreditation and Membership," section V.

10.4.2 While distance education requirements will normally conform to those identified in general standards and in specified degree program standards, the board may approve modified requirements for programs that embody an educational design that ensures high standards of quality, congruence with the educational mission of the school, and coherence with the educational values and outcomes of theological education.

DEGREE PROGRAM STANDARDS

(The following standard is the same for ANY degree that might be accredited by ATS)

A.3.2.2 If requirements can be completed in extension centers or by means of distance learning, the institution must be able to demonstrate how the community of learning, education for skills particular to this degree, and formational elements of the program are made available to students.