U.S. Department of Education

Staff Report
to the
Senior Department Official
on
Recognition Compliance Issues

RECOMMENDATION PAGE

1. **Agency:** Association of Advanced Rabbinical and Talmudic Schools (1974/2007)
   (The dates provided are the date of initial listing as a recognized agency and the date of the agency's last grant of recognition.)

2. **Action Item:** Interim Report

3. **Current Scope of Recognition:** The accreditation and preaccreditation ("Correspondent" and "Candidate") within the United States of advanced rabbinical and Talmudic schools.

4. **Requested Scope of Recognition:** Same as above.

5. **Date of Advisory Committee Meeting:** December, 2010

6. **Staff Recommendation:** Accept the report.

7. **Issues or Problems:** None

EXECUTIVE SUMMARY

PART I: GENERAL INFORMATION ABOUT THE AGENCY

The Association of Advanced Rabbinical and Talmudic Schools, Accreditation Commission (AARTS) accredits advanced rabbinical and Talmudic institutions that grant postsecondary degrees such as the baccalaureate, master's, doctorate, first rabbinic, and first Talmudic degrees.

AARTS-accredited schools offer a program of Talmud and related studies. ("Talmud" is the collection of Rabbinic writings that date back to the third century whose writings form the basis of religious authority for traditional Judaism.)

The enrollment at AARTS-accredited institutions, with the exception of a few larger schools, is approximately 100 students. Of the 63 institutions currently accredited by the Commission, 38 are located within the New York metropolitan area. Nationwide, AARTS schools are located in California, Colorado, Connecticut, Florida, Illinois, Maryland, Michigan, New Jersey, New York, Ohio, and Pennsylvania.

All of the agency's accredited schools rely on the Commission's continued recognition by the U.S. Department of Education for access to Title IV, HEA programs.

Recognition History

The agency is a national institutional accreditor. AARTS scope of recognition is for the accreditation and preaccreditation ("Correspondent" and "Candidate") of advanced rabbinical and Talmudic schools. AARTS was first added to the list of nationally recognized accrediting agencies in 1974. The agency's recognition has been periodically reviewed and continued recognition has been granted after each review.

The last full review of the agency was conducted in May 2007 at which time the Committee recommended and the Secretary concurred that the agency's recognition be renewed for five years and that it submit an interim report by May 31, 2008 addressing the four issues identified in the staff analysis. Due to the passage of HEOA, the agency's report was on hold until the NACIQI was reconstituted. Due to the lapse in time, the agency was allowed to submit updated information for review as part of this interim report. That interim report and subsequent update is the subject of this analysis.

In conjunction with the current review of the agency's interim report and supporting documentation, Department staff observed an on-site evaluation conducted by the agency on August 15, 2010.

PART II: SUMMARY OF FINDINGS

§602.16 Accreditation and preaccreditation standards

(a) The agency must demonstrate that it has standards for accreditation, and preaccreditation, if offered, that are sufficiently rigorous to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits. The agency meets this requirement if–

(1) The agency's accreditation standards effectively address the quality of the institution or program in the following areas:

> **(i) Success with respect to student achievement in relation to the institution's mission, which may include different standards for different institutions or programs, as established by the institution, including, as appropriate, consideration of course completion, State licensing examination, and job placement rates.**

Previous Issue or Problem: During the 2007 review of the agency's petition for continued recognition, Department staff determined that although the agency's standards require institutions to assess their own effectiveness, and permit institutions to select objective measures such as course completion rates, job placements and admissions to graduate programs, Department staff could not verify that accredited institutions systematically conduct the self-assessment required by the agency. Department staff review of sample self-studies and observation of an on-site visit during the review of the agency's 2007 petition for continued recognition revealed that the basis for institution determinations of student achievement was through the daily interactions between the instructor and student and that student achievement data was not routinely collected and analyzed by the institution to substantiate institutional effectiveness as stated in the agency's standards. It was evident that although the agency's standards require that institutions evaluate institutional effectiveness and suggest several external measures that institutions can use, this component of the agency's standards was not being implemented by the institution nor evaluated by the agency during site reviews. Department staff found that while the agency's standard was sufficient to meet the Criteria, the agency neither demonstrated that it required its institutions to demonstrate compliance with its standard in their self-studies nor that it evaluated its institutions against the standard as written.

Discussion: The agency has further clarified in its Handbook that institutions select their own assessment instruments and strategies and assess student achievement in relation to the institution's mission. The agency's Accreditation Manual and Site Visitor's Manual have been modified and provide additional guidance to both institutions and evaluators regarding how to address the assessment of student outcomes. The agency's Accreditation Manual expands the list of outcome measures to include capstone projects, selectivity trends in admissions, alumni surveys, student satisfaction surveys, graduation rates, transfer to institutions for advanced study, and admission to graduate programs as well as issues such as ethics, personal integrity, and service to mankind. Institutions are also free to select their own outcomes measures and to submit them for approval by the agency. Whatever the measures, institutions must "describe trends or other conclusions" identified by the data collection and assessment and how this information is the basis of institution improvements or change. The agency's Site Visitor's Manual states that site visitors are to review outcomes measures data and to determine whether institutions have evaluated the data and formed conclusions regarding the outcomes data collected, and whether the data is sufficient to allow the institution and thereby the site visitors to judge institutional success.

The agency provided sample institutional self studies that included the new learning outcome measures including a self study that was deemed deficient in this area, and that was revised by the institution to meet the agency's requirements. However, as the agency did not provide any explanation of its basis for citing the institution, it remains unclear what are the factors involved in determining sufficiency vs insufficiency. In addition, the agency provided site visit reports which included the review of student outcomes data. The agency did not provide any evidence that its accredited institutions make changes as a result of their evaluation of outcomes data.

It appears that the agency's current measure of success with regard to student achievement is the institution's engagement in the process of reviewing its outcomes data. But, even though the agency provided documentation that institutions are reporting data on this standard and that the agency and site visitors are reviewing that data is collected, it has not provided clear and sufficient information demonstrating the criteria or process that the agency uses to evaluate the sufficiency of the institutional assessment/improvement activity. For example, the agency has not discussed its criteria for evaluating the objectives/goals established by the institution; assessing the data collection activities and improvement plans; and assessing the outcomes resulting from implementation of the improvement plans. The agency needs to provide additional information of this type to clarify what the agency expects of an accredited institution in meeting its student achievement standard.

Analyst Remarks to Response:

The agency provided an expansive response regarding Talmudic study and its assessment of student achievement, as well as a historic perspective of the agency's interactions with the Department. As a note of clarification, the Department's concern regarding the agency's application of its student achievement standards is not one of qualitative versus quantitative measures as suggested by the agency. The issue raised by the Department was that the agency had not demonstrated that it was applying its current student achievement standard. The agency standard is that institutions evaluate institutional effectiveness in the context of student achievement and student outcomes. Specifically, the agency requires that institutions select their own assessment instruments and strategies and assess student achievement in relation to the institution's mission; institutions' must "describe trends or other conclusions" identified by the data collection and assessment and reflect how this information is the basis of institution improvements or change.

During the on-site visit, Department staff observed the agency team review the institution's assessment data regarding student achievement, which included retention rates, and the acceptance rate at graduate institutions and the caliber of the graduate institutions. Throughout the on-site visit, the AARTS team members discussed student achievement information and assessment with faculty, staff, and board members. The faculty and staff talked at length of how they assess each student and solicit feedback, and then use that information to assess the program and ultimately the institution overall. The faculty and staff indicated that the individual review of student progress occurs on a daily basis, that there are weekly meetings of the faculty and staff to review the program as a whole, and that the students are administered end-of-year oral and written assessment tests. The agency on-site team reviewed this information to determine the success with respect to student achievement in relation to the institution's mission, and used the Site Visitors Manual to assist in the assessment. Evidence of this review is documented in the Final Visiting Team Report.

Staff Determination: The agency meets the requirements of this section of the Criteria.

(a)(1)(ii) Curricula.

Previous Issue or Problem: During the 2007 review of the agency's petition for continued recognition, Department staff concluded that while the agency's curriculum standard was well defined for the agency's undergraduate degrees, the agency did not have standards that adequately addressed graduate degrees. While the agency requires institutions to explain how and to what degree their graduate program differs from the undergraduate program, asking institutions to explain how and to what degree the graduate program differs from the undergraduate program is not a standard of the quality of the graduate program. The agency was required to develop graduate degree standards or interpretive criteria at the master's and doctoral degree levels for its current standards that would allow the agency to evaluate the quality of each of those degree programs offered through its institutions. Furthermore, it also needed to demonstrate that it has evaluated institutions using those standards.

Discussion: The agency has revised its Handbook to state that each institution must demonstrate that its graduate program curriculum differs from its undergraduate curriculum. The agency standard for graduate programs requires that graduate programs must be "designed to develop originality and independence of thought in the student body over and beyond that which is expected from a quality undergraduate program." What is not clear and needs further explanation is what the agency expects in terms of originality and independence at the graduate level that is "beyond" what it expects at the undergraduate

level. The graduate curriculum must also demonstrate “a significant expansion in the content of the undergraduate program,” and “stress goals such as creativity, maturity, and intellectual sophistication.” Again, what is not clear is the agency’s expectation regarding differences in the content in the graduate program that is above that which is expected of the undergraduate program.

The agency provided expanded guidance to site evaluators and institutions in the Site Visitors Manual via multiple questions that site reviewers might ask in order to further differentiate between undergraduate and graduate programs. However, it remains not clear as to how the information gained from the questioning will be assessed by the agency in determining whether the curriculum is at an undergraduate or graduate level. The agency needs to provide additional clarity on what distinguishes an undergraduate program from a graduate program when the agency is assessing whether it meets the agency’s level of quality for accreditation.

Analyst Remarks to Response:

In its response, the agency described the differences between an undergraduate program and a graduate program and provided several descriptions of graduate programs offered by its accredited schools. These descriptions are insights into the agency’s expectation for a graduate curriculum. Outlined in the narrative and graduate program documents are various program descriptors that establish more clearly the distinction that the agency makes between the graduate and undergraduate program. For example, graduate program curricula are expected to include more advanced principles and to teach broader aspects of the field of study than is found in the undergraduate program. Graduate programs are assessed for their ability to develop in students an understanding of nuances and underlying themes not covered to the same depth in undergraduate programs and the application of that knowledge as reflected in more independent/creative argument from graduate students. Graduate programs are expected to emphasize students’ conduct of independent research, role as lecturers and seminar leaders (teaching assistant) and their development of skills of jurisprudence, etc. The Site Visitors Manual also provides review teams with direction as to how to assess a graduate program as different from an undergraduate program. Specifically, site visitors review the curricula differences between the undergraduate and graduate curriculum levels, any teaching assignments of graduate students, graduate work products (e.g. theses, dissertations, etc.), and overall program quality.

During the on-site visit, Department staff observed the AARTS team apply these expectations and line of questioning in its review of the undergraduate and graduate program curricula. This review is documented in the Final Visiting Team Report.

Staff Determination: The agency meets the requirements of this section of the Criteria.

(a)(1)(viii) Measures of program length and the objectives of the degrees or credentials offered.

Previous Issue or Problem: During the 2007 review of the agency’s petition for continued recognition, Department staff concluded that the agency’s standards and policies were appropriate as they would enable the agency to determine that program lengths were appropriate for the degrees offered; however, the staff determined that the agency did not evaluate whether a institution complied with the agency’s standards and requirements regarding program length and the objectives of the degree. Therefore, the agency was required to demonstrate that it evaluated its institutions against its standard.

Discussion: The agency's Site Visitor’s Manual was modified to include specific guidance with regards to the review of institutional objectives. Specifically, the notation in the Site Visitor’s Manual refers to ensuring that the “program length, objectives and content were appropriate for each degree offered.” The agency provided a copy of the request to institutions for the annual submission of the Institutional Survey, which requires an “Up-to-date Educational Program Course Map” and “Latest Catalog.” In addition, the agency provided two copies of program course maps provided by institutions in response to the request for the annual submission of the Institutional Survey.

Even though the agency provided copies of the program course maps, it has not provided sufficient information to demonstrate that or how this information is reviewed by the agency for compliance with the standard. The agency needs to provide evidence that it assesses program length in relation to the objectives of the degree offered during the accreditation process.

Analyst Remarks to Response:

The agency stated that a review of program length in relation to the objectives of the credential, is conducted annually by AARTS via the annual submission of the Institutional Survey.

However, during the on-site visit, Department staff also observed the AARTS team review the program length and objectives of the degree in the context of the institution's mission, noting that the program length was similar to that of other programs. The agency team discussed the program length and objectives with the faculty and staff extensively, and used the Site Visitors Manual to assist in the assessment. This review is documented in the Final Visiting Team Report.

Staff Determination: The agency meets the requirements of this section of the Criteria.

---

§602.21 Review of standards.

> **(c) If the agency determines, at any point during its systematic program of review, that it needs to make changes to its standards, the agency must initiate action within 12 months to make the changes and must complete that action within a reasonable period of time. Before finalizing any changes to its standards, the agency must--**
>
> > **(1) Provide notice to all of the agency's relevant constituencies, and other parties who have made their interest known to the agency, of the changes the agency proposes to make;**
> > **(2) Give the constituencies and other interested parties adequate opportunity to comment on the proposed changes; and**
> > **(3) Take into account any comments on the proposed changes submitted timely by the relevant constituencies and by other interested parties.**

Previous Issue or Problem: During the 2007 review of the agency's petition for continued recognition, Department staff concluded that although the agency does send out proposed changes for comment, it was not clear that all of the communities of interest, as defined by the agency, were provided an opportunity to comment on the proposed changes. Specifically, the staff was uncertain whether the following groups (all identified by the agency as part of its communities of interest) are offered an opportunity to comment on the standards: students, alumni, parents, community leaders, and board members. The agency needed to demonstrate that it involved all of its relevant constituencies and considered their input in the standards revision process.

Discussion: The agency modified its policies to require institutions to distribute copies of all proposed changes to the standards to administrators, faculty, staff, students, alumni, parents, community leaders, and board members. The agency provided a copy of an annual meeting notice that was sent to all institutions, and in which it was requested that the institutions distribute the notice to administrators, faculty, staff, students, alumni, parents, community leaders, and board members. In addition, the agency provided a blank copy of the survey that it provides to the communities of interest when conducting a systematic program of review of the standards.

Even though the agency stated that it modified its policies, and provided an annual meeting notice and survey, it has not provided sufficient information to demonstrate that the annual meeting notice or survey had been distributed to the communities of interest, and there was no documentation submitted to indicate that any responses were received and evaluated. Additionally, the agency did not provide sufficient information to demonstrate how or that it takes into account any comments on the proposed changes submitted timely by the relevant constituencies and by other interested parties via the annual meeting, survey or other avenue, as there was no documentation submitted concerning comments received and reviewed.

Finally, as noted in the section on curricula standards of this report, modifications were made to the agency's standards, but there was no discussion in that section or in this one as to the process used to revise the standards, and whether or not that process included notice to the agency's relevant constituencies for comment and the review of those comments.

The agency needs to provide evidence that it involves all of its relevant constituencies and considers their input in the standards revision process, and specifically, in the development/revision of its curricula standards for graduate programs.

Analyst Remarks to Response:

The agency provided additional information and documentation that minimally demonstrates that AARTS provides notice to its communities of interest of proposed changes, gives them opportunity to comment on the proposed changes, and takes into account comments by the communities of interest. Specifically, the agency provided, as example, a reliability/validity/relevance form, and report of a Commission meeting during which a standards review discussion was held that incorporated the input from various communities of interest. In addition, the agency provided a statistical analysis of 2008 survey data, review of the data by the Commission, and a notice of the opportunity to comment at the Annual Meeting related to issues concerning the Public Advisory Council.

While the documentation was helpful in suggesting that the agency does involve its constituencies in its activities, the agency was silent on constituency involvement in its revision of its graduate curriculum standards and the information provided is so segmented that the agency's continued effort to involve its constituencies in its standards review and revision processes is unclear. The Department expects the agency to document more systematically how it seeks and considers constituency comments in its review and revision of standards.

In its upcoming petition for continued recognition, the agency must provide clear and complete information and documentation regarding its application of its standards review and revision procedures to include clear and complete evidence of the agency's solicitation of the involvement of all of its relevant constituencies and evidence of the agency's consideration of their input in order to be found in continued compliance with this criterion.

Staff Determination: The agency meets the requirements of this section of the Criteria.

PART III: THIRD PARTY COMMENTS

The Department did not receive any written third-party comments regarding this agency.