



Student Handbook

2023-2024

Academic Year

Revised 7/28/2023

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## **A Word About Bethany**

Founded in 1905 with a vision for spiritual empowerment, sound biblical scholarship and instruction rooted in practical experience, Bethany Theological Seminary offers all persons an education rich in thoughtful reflection, deep learning, and everyday experience for ministries in the church and the world. Bethany is accredited by the Association of Theological Schools in the United States and Canada and by the Higher Learning Commission. As an institution related to the Church of the Brethren, we affirm the importance of community as we study and engage scripture, theology, history, and spiritual formation. With an academic program that is rigorous in thought and deep with meaning, we seek to bear witness to God's work in the world through our commitments to justice and simplicity in the manner of our living, in peacemaking and reconciliation, and in service, care for creation, and holistic mission.

Welcoming all qualified students, Bethany Seminary prohibits discrimination on the basis of race, gender, age, disability, marital status, sexual orientation, national or ethnic origin or religion. Bethany's student body includes creative and imaginative individuals from many Christian denominations and geographical locations both in the United States and abroad. You will study with a wide range of individuals with diverse experiences and backgrounds in a number of course formats to include weekly classes, weekend intensives, two-week intensives, and online courses. Bethany's educational community extends beyond its own student body, faculty, and staff to include our partner seminary, the Earlham School of Religion and other nearby seminaries, as well as congregations and service agencies. In this educational context you will find challenging diversity in theological perspective, academic interest, and vocational direction. We look forward to what you bring to the classroom and to worship, to what we will provide you, and to how together our understanding and faith in Jesus Christ will contribute to the vision and reality of God's Kingdom.

## **Purpose of Handbook**

This handbook is designed to help you understand how Bethany functions as a community of scholars and Christians and to direct you to activities and resources available to you. Other students, faculty and staff will be glad to provide information about topics not included in the handbook. Do not hesitate to ask for help. Receptionists at both Bethany and the Earlham School of Religion (ESR) are very helpful.

Please familiarize yourself with the various school policies found in this handbook at the beginning of the year. Use this handbook as a reference for answers as questions arise.

The content of this publication is for informational purposes only and is not intended to be used as a contract between Bethany Theological Seminary and any other party. Bethany Theological Seminary reserves the right to change, eliminate, and add to any existing (and to introduce additional) rules, regulations, policies, fees and other charges, courses of study and academic requirements. Whenever it does so, the Seminary will give as much advanced notice as it considers feasible or appropriate, but it reserves the right in all cases to do so without notice. This handbook is reviewed and

updated annually, typically during the summer, with the new version available prior to the start of the fall semester.

### **Student Release for Photographs, Recordings, and Broadcasts**

From time to time, Bethany Theological Seminary may take photographs, recordings, videos, or broadcasts of class sessions, chapel, or other events, both for educational and promotional purposes. With respect to any photographs, sound or video recordings, or quotes taken directly of/from you or in which you may be included with others in a group, by virtue of your enrollment at Bethany Theological Seminary, you grant Bethany the right and permission:

1. to use, publish, broadcast, republish in whole or in part, individually or in conjunction with other media, in any form of media currently known or developed in the future
2. to copyright resulting media in Bethany's name or otherwise
3. to make such use for any purpose whatever, be it for education, illustration, promotion, art, advertising and trade, or any other purpose reasonably consistent with Bethany's mission
4. to use your name in connection with the media if Bethany so chooses; and you hereby release and discharge Bethany Theological Seminary from any and all claims and demands arising out of or in connection with the use of these materials. You may request to opt out of this release by contacting the director of marketing and communications in writing.

## **Our Mission and Vision**

So that the world will flourish!

As an innovative learning community grounded in an Anabaptist and Radical Pietist witness, Bethany Theological Seminary empowers every student to lead through spiritual engagement, faith-filled thought and transformative practice so that the world flourishes.

Bethany's Strategic Vision speaks to its educational philosophy and commitment to education: Anchored in its commitment to academic freedom, Bethany enunciates a strong prophetic witness rooted in a deep theological understanding of scripture and the Anabaptist traditions of disciple-making, peacebuilding, conflict transformation, and advocacy for justice. Bethany claims a position as a leading center for the study and practice of emerging areas of religious interest across faith traditions. Bethany exemplifies the best of high-impact learning practices, engaging students in an ongoing dialogue of theory and practice to develop servant leaders with both deep theological understanding and the sensitivity and skill to forge genuine change in church and community. Engaging people of diverse religious, national, geographic and social backgrounds, on the campus and beyond, the Bethany community nourishes respect for differences and sustains spiritual empowerment for students and alumni. (Strategic Vision, March 25, 2017)

Our Mission is enhanced by partnerships with the Earlham School of Religion and those that make educational opportunities accessible in other locations: non-graduate study and continuing education through the Brethren Academy for Ministerial Leadership and the Susquehanna Valley Ministry Center.

## **Community Life and Worship**

### **Access to Bethany Center**

The Bethany Center is located on the Earlham College campus in Richmond, IN. Normal office hours are 8:00 a.m. to 5:00 p.m. Monday through Friday. Students needing access to the building at other times will use their student ID cards to gain access.

### **Access to Computers and Networks**

Seminary Computer Services (SCS) may be contacted via phone (765-983-1262/1568), email ([helpdesk@earlham.edu](mailto:helpdesk@earlham.edu)), or in person (Room 209 in the ESR Center).

While using the seminary computer systems and resources, you must:

- Obey all federal and state laws, as well as seminary policies and procedures.
- Protect your user accounts from unauthorized use (do not share your password).
- Report attempted breaches of IT security systems to your immediate supervisor, the seminary dean, or SCS.
- Use your seminary-issued email address for seminary-related email communication.
- Log off your computer account prior to leaving a computer unattended.

And you must not:

- Use another person's system or data without authorization.
- Use another person's username and/or password.
- Attempt to bypass security software or settings in place, or otherwise gain access to resources or data to which you have no legitimate rights.
- Leave a seminary-owned portable device unattended or unsecured.
- Do anything to negatively affect the equipment's performance capabilities.
- Install software onto seminary-owned equipment; if you need an application installed for the performance of your duties, send an email to SCS ([helpdesk@earlham.edu](mailto:helpdesk@earlham.edu)).
- Use seminary systems for commercial or political purposes.
- Store personal documents on seminary servers.

Though the seminary and SCS do not actively monitor behavior, we do reserve the right to inspect and log running processes and files saved on seminary-owned equipment. Backup copies of all documents are regularly made, so any personal documents saved to a seminary-owned device may have copies on our backup servers. By using seminary-owned equipment, you are providing the seminary permission to copy and view any such personal documents.

The seminary is not responsible for the security and preservation of personal data or possessions. We do not insure your personal possessions, and no support for personal equipment will be given except at the request of the seminary dean or the benevolence of SCS.

Personal computers must have a functioning and up-to-date antivirus software installed prior to connecting to the seminary network.

### **Internet Access**

Bethany Seminary provides students with wireless Internet access on the seminary campus. Any use of Bethany's Internet connection should comply with all current seminary policies. Any illegal activity performed using seminary-owned equipment or using the seminary Internet connection is likely to result in separation from the seminary and criminal prosecution. This includes criminal mischief performed with noble intent.

### **Computer Lab**

Students have access to the seminary computer lab on the second floor of the ESR Center. The lab is maintained by both Bethany and ESR and serves both communities. Currently, there are no fees for printing.

The lab is unlocked during normal building hours. During other hours students may gain access to the building and the lab using their Bethany ID card.

Students with printer problems should contact SCS for assistance.

### **Earlham College Labs**

Bethany students are welcome at any of the computer labs located on the Earlham College campus. These labs are governed by Earlham College's Information Technology Services (ITS) and are not under the control of Seminary Computer Services (SCS).

### **Student-Owned Computers**

SCS is not responsible for the support of personal equipment, short of helping in connecting to the seminary network and printers. Students may wish to check with their retailer before buying any software as significant academic discounts are often available.

### **Computer Requirements for Students**

Certain minimum requirements are necessary to ensure that your computer can utilize the various educational systems utilized by the seminary. Students must either own or have access to equipment with these minimum requirements.

These requirements will be reviewed annually and updated as needed. Students with questions about whether their equipment meets these requirements should contact SCS for assistance.

Laptops may be loaned to students on a temporary basis, subject to availability, and at the discretion of SCS.

- Minimum Requirements for Personal Computers
- Computer: desktop or laptop (not a tablet or other device as primary equipment)

- Processor: 1.8 GHz, minimum; Dual-core or better, recommended
- RAM: 2 GB minimum; 4 GB or more is recommended
- Operating System: Windows 10 or newer; or macOS 10.12 or newer; or Linux
- Internet-access: DSL, cable, or other high-speed service
- Software:
  - A word processor capable of saving DOCX or PDF files, such as Microsoft Office, LibreOffice, or Pages
  - A PDF reader such as Adobe Reader
  - A web browser: Microsoft Edge, Google Chrome, Mozilla Firefox, or Apple Safari (note: some services may not be compatible with Safari)
- Requirements for Connections students:
  - Webcam
  - Headphones with a microphone
- In many cases, using headphones and an external microphone provides a better experience for all participants rather than using a laptop's internal microphone and speakers
- Some classes may require other software, including:
  - Zoom

Students may use the PCs located in the computer lab, which will meet or exceed these same requirements.

### **Use of Office Computers**

Students serving as assistants to faculty and staff members may have access to seminary-owned computers if necessary for their responsibilities. Such use should be limited to work-related tasks; coursework should be confined to lab or personal computers. Use of a faculty or staff computer is at the invitation and discretion of the faculty or staff member for whom the student is working. Front desk workers are not allowed to use the computer or copier in that location when they are not working.

### **Email**

All seminary students, regardless of location, are issued usernames, passwords, and an email account by Seminary Computer Services. All seminary-related emails will be sent to your seminary address. Students may automatically forward their email to a third-party address but are still responsible for remembering their username and password, which also provide access to other services, including the library and other resources. Many important reminders and policy updates are communicated via email and it is the responsibility of the student to remain informed.

### **Email Lists**

There are two electronic mailing lists (aka "listservs") for seminary student use, [students@bethanyseminary.edu](mailto:students@bethanyseminary.edu), and one for both seminaries, [students@sem.earlham.edu](mailto:students@sem.earlham.edu). Students need permission to use these listservs, and for specific notifications. Please use the appropriate list for your intended audience. Contact the Director of Student Development for more information.



Students are automatically subscribed to the appropriate list when they matriculate. Important information is distributed via the student list, so it is important that you remain subscribed. We try to keep superfluous or undesirable posting off the list, so please use discretion and follow the guidelines below when posting.

### **Weekly Announcements**

Bethany informs its community of events through several means: The signage in the Gathering Area, student listserv, and the front page of the Bethany website. We share a Facebook page with ESR, called ESR/BTS Community Life Page. In order to become a member of that page, you must add yourself. Once added, members may add posts about upcoming events, ask questions, or post information relevant to the Bethany/ESR community.

### **Advising/Personal Counseling**

The faculty at Bethany is interested in your well-being. Every faculty member is available for a limited amount of advising not only on academic matters, and as an initial contact for personal concerns. Faculty advisors are assigned to each student upon entrance to Bethany. These assignments may change from year to year due to sabbatical accommodations or other administrative reasons. For specific concerns, you are referred to the following for special counseling advice. All individuals listed are available to students through email or by telephone, regardless of your location.

Members of the Pastoral Care Team: prayer and ministry concerns; concerns linked to Brethren faith and practice, national and global concerns, and pastoral care. Prayer concerns are shared online for persons connected directly with Bethany: students, employees, trustees, emeriti faculty and staff, and their immediate families.

Financial Aid and Enrollment Assistant: concerns about finances and financial aid.

Academic Dean/Faculty Advisors: issues related to academic life or vocational identity.

Director of Student Development: support regarding spiritual formation, personal issues, vocational/educational discernment, academic issues, interpersonal conflicts, student success coaching, housing and employment. This office oversees several funds to assist students in times of emergency or counseling needs.

### **Student Employment: Work Study**

Bethany has a limited number of openings for student employment both on and off campus. Students must qualify by meeting federal guidelines and demonstrating financial need.

For information regarding Work-Study employment and job availability, go to <https://bethanyseminary.edu/admissions/financial-aid/> or contact the Financial Aid and Enrollment Assistant.

Bethany Theological Seminary's policy prohibits discrimination in employment opportunities or practices with regard to race, gender, age, disability, marital status, sexual orientation, national or ethnic origin, or religion.

### **Chapel**

Chapel services are held at Bethany's Nicarry Chapel most Wednesdays at 11:20 a.m. Providing worshipful and educational opportunities for Bethany students, these services are coordinated by class members of each year's "Patterns of Worship" class (M220) under the supervision of the teaching faculty member responsible for that course and with the assistance of a Student Chapel Coordinator (SCC). Faculty, staff, and students are invited to preach sermons, design and lead thoughtful and creative worship services as coordinated with the SCC and the faculty member.

For those who have not yet participated in the Patterns of worship course, please contact the faculty member and/or the SCC if you would like to help prepare, contribute to, and/or lead one of these services because all services are reviewed before presentation and/or bulletin preparation. Also, students must successfully complete an introductory-level preaching course before preaching in chapel.

Joint Services of Worship are held for the Bethany and ESR communities at 11:20 a.m. at either Nicarry Chapel in the Bethany Center or the Quigg Worship Room of ESR on a regular basis.

### **Joint Chapel and Other Worship Opportunities**

Joint worship services are coordinated by the Joint Worship Committee of both seminaries. Persons interested in serving on this committee to help plan meaningful and creative worship services for both seminaries are encouraged to contact the Academic Dean. Other worship opportunities include programmed and unprogrammed services of worship coordinated by ESR throughout the week. Locations and times of chapel events will be posted on the "weekly white board" in the Gathering Area and through email announcements from the SCC. All members of the Bethany and ESR communities are welcome to attend all worship events as members of the faculty, students, staff, and guests from various denominations lead worship and speak at these services. While there are no regularly scheduled chapel services during January, May, or August intensives, students are encouraged to organize their own worship gatherings.

### **Common Meal**

Common meal is an important part of our community life together. We utilize local catering, potlucks, brown bags, and other simple meals. It is frequently held on Wednesdays at noon, at the rise of worship or after a program. Bethany holds our common meals in our own gathering room, with everyone pitching in for set up and

clean up. Joint common meals are held in the ESR dining room and are catered, typically taking place on Wednesdays during August, January, and May intensives; and throughout the semester following joint worship events. An email will go out at the beginning of each week to let the community know the format and place of the week's common meal.

### **Community Creation**

Community Life at Bethany is dependent upon each person and their participation. In many cases, friendships, outings, and shared interests will arise out of the interaction on campus and through online course connections. We encourage each student, their families, faculty and staff members to be open to the possibilities of community as it takes shape each academic year, wherever the student may be located. If you want to see something happen, you can either lead out or contact the Student Leadership Team or the Director of Student Development.

### **Bethany Neighborhood**

The Bethany Neighborhood is located on the corner of College Avenue and C Street. Several houses join backyards to create a common area. Each house creates community within itself. The Neighborhood is part of Bethany's commitment to reducing the cost of seminary. The neighborhood is home to members of the Bethany Bold scholarship program, international students, student renters, and Earlham School or Religion students. If you are interested in applying to Bethany Bold, or in becoming a renter in the Bethany neighborhood, please contact Student Services.

The Neighborhood also provides housing opportunities for Connections students during weekend and two week intensives, at no cost to the student. To reserve housing for an intensive, please use the housing reservation form found on the Bethany website.

### **Medical Insurance**

Bethany Theological Seminary does not provide student insurance. Students are expected to participate in the current government structured health care bill.

### **Earlham College Health Services**

Earlham College Health Services is open Monday - Friday from 9:30 a.m. until 1:00 p.m. when classes are in session. There is a fee of \$25 per visit to see an RN and \$30 per visit to see a doctor or Nurse Practitioner. Labs, medicines and supplies have an additional fee. Students will need to submit their own insurance claims. Health Services is closed during break periods, including the entire summer, from early May until late August. To contact Health Services, please telephone (765) 983-1346.

### **Music**

Music in the Church of the Brethren is an art form, and we encourage small ensembles, individual musicians and others to coordinate special music for worship through the Ministry of Worship class. Your musical offerings are welcomed. Please contact the faculty representative to joint chapels if you would like to offer something for joint

chapel or Dawn Ottoni-Wilhelm or the Student Chapel Coordinator if you would like to prepare something for Bethany Chapel.

### **Social, Recreational, and Outreach Activities**

Activities are planned and coordinated through various Community Governance Committees and individual students. Announcements go out via the student listserv and on the board in the gathering room. Bethany students also benefit from the numerous athletic events and cultural activities of Earlham College. Students should feel empowered to organize an activity, if none has been planned.

### **Sports and Outdoor Activities in Richmond, IN**

All currently enrolled Bethany students may purchase a membership to the Earlham College Athletics & Wellness Center (AWC). The fee for the AWC will be collected at the time of enrollment or renewal of your membership. Obtain a receipt which may be brought to Bethany and a small subsidy of the membership cost may be available from the Seminary. Days and hours the Wellness Center is accessible will be announced on the Earlham website.

Outdoor sports facilities on the Earlham campus include several tennis courts, numerous athletic fields and greens. The woods on the southwest edge of the college campus provides hiking and riding trails. Bethany and ESR students are encouraged to participate in Earlham's intramural sports.

In the Richmond area, there are twenty local parks, one public golf courses (Highland) and one public pool. Hayes Regional Arboretum on Elks Road occupies over 400 acres of the city's east side and features a nature center and offers educational workshops and tours.

### **Local Cultural Activities**

Various cultural and entertainment events are presented on the Earlham College campus each year. Theater productions, concerts, and convocations featuring noted speakers are among the offerings. Several events are free of charge; others require an entrance fee. Check at the Runyan Center desk to see if student discounts apply to Bethany students.

Local year-round entertainment includes productions by the Richmond Civic Theater and the Richmond Symphony Orchestra.

For museum goers, the Joseph Moore Museum featuring natural history exhibits is on the college campus and the Wayne County Historical Museum is in the Starr Historical District at North 13th and "A" Streets downtown. The Morrison Reeves Library, located at 80 North Sixth Street, regularly sponsors monthly brown bag luncheons featuring local entertainment and regularly schedules children's programs and story hours.

For additional information about local attractions and activities contact the Wayne County Convention and Tourism Bureau at (765) 935-8687 or visit their website.

### **Student Initiated Activities**

Student initiated activities are encouraged at Bethany. In recent years students have organized men and women's groups, worship, prayer and Bible study groups, and various support and interest groups. Your leadership will ensure that events happen. To organize an activity, outing, or group please contact Director of Student Development for coordination, and make your announcements through the student listserv, Facebook, and the board in the gathering room. As our student body expands to include individuals from many states, students are encouraged to be creative in how they initiate activities. Connection students can think creatively as to how they might form regional group or online spirituality groups. The Director of Student Development can assist with some monetary funds as well as other manners of support.

### **Students with Disabilities/Special Needs**

Students with disabilities/special needs that require special accommodation should contact the Director of Student Development as soon as possible following the submission of the enrollment deposit. The Bethany Center is a fully accessible and user-friendly facility. See the Disability Policy in this handbook. Accommodation Plans must be written within the first two weeks of the start of semester classes in order to be submitted to professors in a timely manner.

### **Worship in Churches**

All congregations welcome student members. There is no official Seminary church. You are encouraged to associate with a local church for worship, fellowship, and spiritual nurture. The Director of Student Development will be happy to help a student find a meaningful fit for church involvement. Bethany's Pastoral Care Team strongly recommends being part of a faith community while in seminary.

### **Lifestyle**

Students admitted to Bethany Theological Seminary understand that their lifestyle should be guided by the ethos of the Church of the Brethren as specified by official statements of its Annual Conference. That ethos emphasizes equal support for individual conscience and the willingness to submit one's lifestyle to the support and approval of the Seminary community. Like the Church of the Brethren, the Bethany community uses the New Testament as a guide for determining how persons should relate to each other in love and concern. (Adopted by the Board of Directors, March 31, 1978, and the Joint Faculty/Student Meeting, May 10, 1978.)

### **Ethical Conduct Policy**

#### Background

Bethany's Mission: As an innovative learning community grounded in an Anabaptist and Radical Pietist witness, Bethany Theological Seminary empowers every student to lead through spiritual engagement, faith-filled thought and transformative practice so that the world flourishes.

Bethany's Strategic Vision: The Strategic Vision speaks to Bethany's educational philosophy and commitment to education:

- Anchored in its commitment to academic freedom, Bethany enunciates a strong prophetic witness rooted in a deep theological understanding of scripture and the Anabaptist traditions of disciple-making, peacebuilding, conflict transformation, and advocacy for justice.
- Bethany claims a position as a leading center for the study and practice of emerging areas of religious interest across faith traditions.
- Bethany exemplifies the best of high-impact learning practices, engaging students in an ongoing dialogue of theory and practice to develop servant leaders with both deep theological understanding and the sensitivity and skill to forge genuine change in church and community.
- Engaging people of diverse religious, national, geographic and social backgrounds, on the campus and beyond, the Bethany community nourishes respect for differences and sustains spiritual empowerment for students and alumni. (Strategic Vision, March 25, 2017).

### Ethical Standards

As part of its stated mission, Bethany Seminary is committed to ethical standards for students. Seminary students are expected to conduct themselves with integrity consistent with the institution's ethical standards.

The Seminary reserves the right to take disciplinary actions against a student for violations of these standards. These actions may include exclusion or dismissal from the Bethany Neighborhood (once a student is excluded or dismissed from the Neighborhood, they cannot reapply or be reinstated to the Neighborhood or its programs), suspension or expulsion from the Seminary, withholding of a degree or certificate, or other action the Seminary deems appropriate (including the revocation of denominational tuition funding or scholarships), or legal or civil action.

Seminary students are subject to the policies contained in the student handbook. Of particular importance are those pertaining to ethical conduct, including Lifestyle, Drug Abuse Prevention, Financial Policies, Title IX, Sexual Misconduct, Ministry Formation Conduct Policy, Access to Computers and Networks, and as applicable, the policies contained in the Bethany BOLD manual. Students who wish to challenge disciplinary actions due to ethical concerns may do so during the process outlined below. In addition to the Ethical Conduct Policies, students are expected to adhere to the Academic Policies contained in the student handbook and catalog. Disciplinary action due to academic violations is covered by those relevant policies. This includes for example, Plagiarism, Cheating, Attendance, and Failure to complete the requirements for removal from Academic Probation. Students who wish to challenge disciplinary actions due to academic concerns have recourse to the Complaint Policy (Academic Coursework) in the student handbook.

### Disciplinary Process

As the Student Services department becomes aware of any possible violation to the Ethical Conduct Policy, the below steps will be followed:

- Possible violations will be documented in detail in writing by the Director of Student Development or the Executive Director of Student Services.
- A conversation will be scheduled with the student in question to investigate and clarify the situation and circumstances. This conversation may include the following individuals: the student, the Director of Student Development, the Executive Director of Student Services, the Academic Dean, and any other relevant persons pertaining to the situation.
- The student will be presented in writing the details pertaining to the possible violation(s).
- The student will have an opportunity to clarify or dispute the possible violations with written clarifications or explanations.
- Once the details have been established, the student and a Seminary representative present during the conversation will sign the document in agreement with its contents.
- This final signed document will be given to the student with a copy held in the student's admissions file.

### Ethical Conduct Disciplinary Action

Student Services is responsible to ensure that the Ethical Conduct Policy is followed and that appropriate disciplinary actions for relevant violations are administered. Actions may include, but are not limited to:

- Exclusion or dismissal from the Bethany Neighborhood (once a student is dismissed from the neighborhood, they cannot reapply or be reinstated to the neighborhood or its programs).
- Suspension or expulsion from the Seminary
- Withholding of a degree or certificate
- Legal or civil action.
- Other actions deemed appropriate by seminary staff to address the violation

### Review

A student may seek a review of the decision of the Student Services Department through the office of the President of the Seminary by written appeal. It will be the President's decision to support or overturn the decision of the department. There are no further appeals beyond this decision.

(Policy approved by Leadership Team, March 1, 2023)

### **Annual Conference Statements**

For the Church of the Brethren, Annual Conference is the highest legislative authority of the Church "in all matters of procedure, program, polity, and discipline." Bethany supports all Annual Conference Statements and Policies, particularly those that pertain to those in ministry, and ministry settings. Most Annual Conference Statements, in order of date, can be found online at <http://www.brethren.org/ac/statements/>

It is recommended and expected that Bethany Seminary students will read the following Annual Conference statements. They can be found at the link above.

### **Drug Abuse Prevention Policy**

All schools, which receive Federal Financial Aid funds (Title IV), are required to have in place a plan to prevent and treat drug abuse among students, faculty, and staff. These requirements are contained in two separate, but related laws:

- The Drug-Free Workplace Act of 1988 (Public Law 100 - 690).
- Drug Free Schools and Communities Act Amendments of 1989 to the Higher Education Act of 1965 (Public Law 101 - 226).

Bethany Theological Seminary is concerned about the use of drugs by members of the community. A "Statement on the use of Alcohol and Tobacco on the Bethany Campus" was adopted by the faculty and board in 1969.

All employees of the Seminary (including student employees) can expect a "drug-free workplace." That is, employees will not be offered drugs or expected to work with fellow employees whose jobs are affected by substance abuse.

While few members of the Bethany community have experienced problems with substance abuse, the Seminary stands ready to help anyone who experiences problems in this regard.

### **Our Policy**

1. Members of the community are expected to refrain from the use of alcohol, tobacco, and drugs. In our time the use of beverage alcohol and the consequences of its use have become one of the greatest social problems. Because it impairs mental and physical acuity, drinking is the cause of a large share of the injuries and fatalities that occur on the highways. Because it is a depressant drug, alcohol dulls sensibilities, releases inhibitions and causes [people] to be unable to respond to the love of God or neighbor. Because it is a habit-forming drug to many people, alcohol has resulted in the disease of alcoholism, the incidence of which is exceeded only by heart disease and cancer in the United States. It is urgent that Christians use every opportunity to point up the need for greater attention to and care for those who are subject to alcoholism. In his/her care for the neighbor, the Christian is called to witness in his/her personal life against the evils of beverage alcohol and to oppose the massive social and economic pressures that promote its use
2. Students or employees who experience difficulty with substance abuse can expect some help from the Seminary:
  - a. Students or employees who need such therapeutic intervention.
  - b. Any student or employee who experiences trouble with substance abuse is encouraged to apply for financial support toward participation in one of the many drug treatment programs in our geographic area. The amount of support will be dependent on the person's financial position. The primary



financial responsibility rests with the substance abuser, but the support is made available both to encourage use of a treatment program and to encourage the abuser not to hide his/her problem. The Seminary sets aside a sum of money each year to subsidize counseling.

## **Title IX Policy**

### **I. STATEMENT OF NON-DISCRIMINATION, TITLE IX & VAWA**

Bethany Theological Seminary (“Bethany”) prohibits any form of discrimination and harassment on the basis of sex, race, color, age, religion, national or ethnic origin, sexual orientation, gender identity or expression, pregnancy, marital or family status, medical condition, genetic information, veteran status, or disability in any decision regarding admissions, employment, or participation in an institutional program or activity in accordance with the letter and spirit of federal, state, and local non-discrimination and equal opportunity laws, such as Titles VI and VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, The Age and Discrimination in Employment Act, The Americans with Disabilities Act and ADA Amendments Act, The Equal Pay Act, and Indiana state laws. To view Bethany’s full statement on non-discrimination, see Bethany’s Student Handbook and Employee Handbook.

Bethany also complies with the Jeanne Clery Disclosure of Campus Security Policy and Campus Security Policy and Campus Crimes Statistics Act, as amended by the Violence Against Women Act (VAWA). Title IX prohibits retaliation for asserting or otherwise participating in claims of sex discrimination. VAWA imposes additional duties on universities and colleges to investigate and respond to reports of sexual assault, stalking, and dating or domestic violence, and to publish policies and procedures related to the way these reports are handled.

Bethany Theological Seminary has designated the Title IX Coordinator to coordinate its compliance with Title IX and VAWA and to respond to reports of violations. Bethany has directed the Title IX Coordinator to coordinate Bethany’s compliance with the Clery reporting related to VAWA requirements. Bethany will promptly and equitably respond to all reports of sex discrimination, sexual misconduct, and sexual harassment in order to eliminate the prohibited conduct, prevent its recurrence, and redress its effects on any individual or the community.

### **II. POLICY STATEMENT**

Title IX of the Education Amendments of 1972 (“Title IX”) prohibits discrimination based on sex in education programs and activities that receive federal financial assistance. Bethany is committed to the principles of equal opportunity and seeks to establish and maintain an environment which ensures equal access to education for all Bethany community members including students, applicants for admission, employees, applicants for employment, guests, and visitors. Bethany does not discriminate on the basis of sex in any education program or activity operated by Bethany including, but not limited to, admissions, employment, recruitment, compensation, and athletics as well as access to housing and facilities, classes and schools, counseling, employment assistance to students, health and insurance benefits and services, and fringe benefits. Bethany is required by Title IX and the regulations thereunder not to discriminate in such a manner.

For additional information or inquiries about the application of Title IX and the regulations thereunder, contact Bethany's Title IX Coordinator and/or the Assistant Secretary of the United States Department of Education.

The Title IX Coordinator's contact information is as follows:

Steven Schweitzer  
Academic Dean, Professor & Title IX Coordinator  
615 National Road W.  
Richmond, IN 47374  
Phone: 765-983-1829  
Email: [titleix@bethanyseminary.edu](mailto:titleix@bethanyseminary.edu)

The contact information for the United States Department of Education, Office for Civil Rights regional office is as follows:

Office for Civil Rights, Chicago Office U.S. Department of Education John C.  
Kluczynski Federal Building 230 S. Dearborn Street, 37th Floor Chicago, IL 60604  
Telephone: (312) 730-1560 Facsimile: (312) 730-1576 Email: [OCR.Chicago@ed.gov](mailto:OCR.Chicago@ed.gov)

Complaints with the Office for Civil Rights must be filed within one hundred eighty (180) days of the last act that the complainant believes was discriminatory. There is no time limit for making a report to Bethany Theological Seminary.

### **III. THE POLICY**

#### **A. Scope of Policy & General reporting Information**

This policy applies to prohibited conduct (as defined in this policy) that occurs in a Bethany Theological Seminary educational program or activity that is likely to have a substantial adverse effect on any member of the Bethany community. There is no time limit for reporting allegations of sex discrimination, sexual misconduct, and sexual harassment, however, Bethany strongly encourages the prompt reporting of incidents to allow the institution to respond promptly and effectively. If the reported respondent is not a member of the Bethany community or is no longer associated with Bethany at the time of the report or at the time in which a resolution process is initiated, Bethany may be unable to conduct an investigation or take disciplinary action. The appropriate grievance or complaint process regarding a report will depend upon the form of prohibited conduct and status of the complainant at Bethany.

Bethany Theological Seminary provides the following information on how to report sex discrimination, sexual misconduct, and sexual harassment to Bethany and outlines Bethany's response to such reports.

Any person may experience sex discrimination, sexual misconduct, or sexual harassment, irrespective of the identity of the complainant or respondent, and is

encouraged to report such incidents to Bethany. Any person, regardless of whether or not the person reporting the alleged incident is the person alleged to be victimized by the incident, may report sex discrimination, sexual misconduct, or sexual harassment to the Title IX Coordinator. Reports may be made at any time, including during non-business hours, in person, by mail to the office address listed for the Title IX Coordinator, by telephone, by email, or any other means that result in the Title IX Coordinator receiving a person's written or verbal report.

Individuals may submit an Incident Report by email, mail, or in person directly to the Title IX Coordinator.

Bethany's Title IX Coordinator is:

Steven Schweitzer  
Academic Dean, Professor & Title IX Coordinator  
615 National Road W.  
Richmond, IN 47374  
Phone: 765-983-1829  
Email: [titleix@bethanyseminary.edu](mailto:titleix@bethanyseminary.edu)

When the Title IX Coordinator receives a report (either written or oral) of sexual misconduct or sexual harassment, they will contact the complainant to provide supportive measures. For more information about Supportive Measures, see Section III.D.

Upon receipt of a report, complaint, or formal complaint, the Title IX Coordinator will review the details of the alleged incident and conduct a preliminary assessment to determine which of Bethany's grievance procedures will be applied to address the report. Regardless of the type of incident, Bethany applies prompt and equitable grievance procedures to resolve complaints of sex discrimination, sexual misconduct, and sexual harassment. Bethany's grievance procedures apply equally to all persons regardless of sex, gender, sexual orientation or gender identity.

Formal complaints of incidents of sexual harassment as defined under Title IX involving Bethany students or employees will be addressed using Process A: Title IX Formal Complaint & Grievance Process, found in Section VI. of this policy.

Complaints of incidents of sexual misconduct as defined in Section III.C. of this policy will be addressed using Process B: Sexual Misconduct Complaint Resolution Process, found in Section VI. of this policy.

When possible, the Title IX Coordinator will notify the reporting party of Bethany's grievance procedures which correspond to the alleged incident.

See Section V. Reporting Sex Discrimination, Sexual Misconduct & Sexual Harassment to make a report of prohibited conduct.

## **B. Title IX Coordinator Responsibilities**

All educational institutions receiving federal financial assistance must designate and authorize at least one employee to coordinate its efforts to comply with its responsibilities under Title IX of the Education Amendment of 1972, which prohibits sex discrimination in education programs and activities. These designated employees are generally referred to as Title IX Coordinators.

The following person has been designated as the Title IX Coordinator at Bethany:

Steven Schweitzer  
Academic Dean, Professor & Title IX Coordinator  
615 National Road W.  
Richmond, IN 47374  
Phone: 765-983-1829  
Email: [titleix@bethanyseminary.edu](mailto:titleix@bethanyseminary.edu)

The Title IX Coordinator is responsible for responding to reports and complaints of sex discrimination, sexual misconduct, and sexual harassment on behalf of Bethany. The Title IX Coordinator's responsibilities include, but are not limited to:

- Receiving the required training in relevant state and federal laws, as well as Bethany's policies and procedures
- Advising an individual, including a complainant, third-party reporter, or respondent, about Bethany's policies and procedures related to sex discrimination, sexual misconduct, and sexual harassment as well as explaining courses of action available at Bethany and the courses of action available externally regarding any such incidents, including reporting to law enforcement
- Receiving incident reports of sex discrimination, sexual misconduct, and sexual harassment
- Informing complainants of the availability of supportive measures
- Informing complainants of the process for filing a formal complaint under Title IX
- Offering supportive measures to complainants designed to restore or preserve equal access to Bethany's education program or activity
- Conducting Title IX investigations
- Working with respondents to provide supportive measures, as appropriate
- Coordinating the effective implementation of both supportive measures (to one or both parties) and remedies to a complainant as well as disciplinary sanctions which may be imposed upon a respondent after the formal complaint process
- Handling other tasks and responsibilities as determined by the Title IX Coordinator.

## **C. Prohibited conduct**

- i. Sex Discrimination

Discrimination against an individual based on that person's sex, gender, gender identity or sexual orientation.

ii. Sexual Misconduct

- Persistent, unwelcome flirtation, advances and/or propositions of sexual nature
- Repeated insults, "wolf-whistling," humor, jokes and/or anecdotes that belittle or demean an individual's or a group's sexuality or sex
- Repeated, unwelcome comments of sexual nature about an individual's body or clothing
- Unwarranted displays of sexually suggestive objects or pictures
- Pressure for sexual favors
- Obscene communications, or bullying based on gender or sexual orientation
- Administration of date rape drug(s)
- Non-consensual sexual contact as well as sexual touching, which includes, but is not limited to, any bodily contact with breasts, groin, genitals, mouth or other bodily orifice of another individual, or any other bodily contact in a sexual manner
- Sexual exploitation, which occurs when an individual takes non-consensual or abusive sexual advantage of another for his/her own benefit or advantage, or to benefit or advantage anyone other than the one being exploited, and that behavior does not otherwise constitute one of the other sexual misconduct offenses
- Invasion of sexual privacy
- Prostitution
- Non-consensual video or audio recording of sexual activity
- Going beyond the boundaries of conscience, such as letting your friends hide in a closet to watch consensual intercourse
- Knowingly transmitting an STI or HIV to another individual
- Possession of child pornography
- Promotion of human sex trafficking
- Committing, attempting, or inciting another to commit sexual contact with another member of the Bethany community without that person's consent, including but not limited to, rape and other forms of sexual assault.
- Other behaviors defined as "sexual harassment" in this policy which occur outside of Bethany Theological Seminary's education program or activity and/or the United States

iii. Sexual Harassment under Title IX

Sexual Harassment is a form of sex discrimination. Title IX defines sexual harassment as conduct on the basis of sex that satisfies one or more of the following three types of behavior:

1. **Quid pro quo harassment**

A Bethany employee conditioning provision of an aid, benefit or service of Bethany on an individual's participation in unwelcome sexual conduct. For example, unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature by a person having power or authority over another constitutes sexual

harassment when submission to such sexual conduct is made either explicitly or implicitly a term or condition of rating or evaluating an individual's educational or employment progress, development or performance. This includes when submission to such conduct would be a condition for access to receiving the benefits of or opportunities in any educational or employment program.

Quid pro quo harassment does not need to be severe and pervasive as required under Item III.2. below, because the abuse of authority in the form of even a single instance is inherently offensive and serious enough to jeopardize equal educational access.

## **2. Denial of Equal Educational Access due to Severe, Pervasive, and Objectively Offensive Conduct (Davis Standard)**

Unwelcome conduct determined by a reasonable person to be so severe, pervasive and objectively offensive that it effectively denies a person equal access to Bethany's education programs or activities.

Signs of enduring unequal educational access due to severe, pervasive, and objectively offensive sexual harassment may include skipping class to avoid a harasser, a decline in a student's grade point average, or having difficulty concentrating in class. However, no concrete injury is required to conclude that serious harassment would deprive a reasonable person in the complainant's position of the ability to access Bethany's education programs or activities on an equal basis with persons who are not suffering such harassment.

## **3. Sexual Assault, Dating Violence, Domestic Violence, and Stalking**

Sexual Assault: Forcible or non-forcible sex offenses under the FBI's Uniform Crime Reporting program (U.C.R.). Various forms of sexual assault include:

Sex Offenses, Forcible: Any sexual act directed against another person, without the consent of the victim including instances where the victim is incapable of giving consent.

Forcible Rape: (Except Statutory Rape) The carnal knowledge of a person, forcibly and/or against that person's will or not forcibly or against the person's will in instances where the victim is incapable of giving consent because of his/her temporary or permanent mental or physical incapacity.

Forcible Sodomy: Oral or anal sexual intercourse with another person, forcibly and/or against that person's will or not forcibly or against the person's will in instances where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity.

Sexual Assault with an Object: To use an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, forcibly and/or against that person's will or not forcibly or against the person's will in instances

where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity.

**Forcible Fondling:** The touching of the private body parts of another person for the purpose of sexual gratification, forcibly and/or against that person's will or not forcibly or against the person's will in instances where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity.

**Sex Offenses, Nonforcible: (Except Prostitution Offenses)** Unlawful, nonforcible sexual intercourse.

**Incest:** Nonforcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

**Statutory Rape:** Nonforcible sexual intercourse with a person who is under the statutory age of consent. In Indiana, the age of consent is 16.

**Dating Violence:** Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim and where the existence of such a relationship shall be determined based on a consideration of the following factors:

1. The length of the relationship
2. The type of relationship
3. The frequency of interaction between the persons involved in the relationship

**Domestic Violence:** Felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction. 34 U.S.C. 12291 (a)(8)

**Stalking:** Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others or suffer substantial emotional distress.

Sexual assault, which includes rape, is referenced in the third prong of the definitions of sexual harassment. Note that any report of sexual assault, dating violence, domestic violence, or stalking is not subject to the Davis elements referenced in the second prong of definitions of sexual harassment, which consider whether the incident was "severe, pervasive, and objectively offensive." A single act of sexual assault, dating violence, domestic violence, and stalking does not need to demonstrate severity, pervasiveness, objective offensiveness, or denial of equal access to education because denial of equal



access is assumed. Therefore, complainants can feel confident reporting such incidents to Bethany and receive supportive measures without wondering whether sexual assault is 'bad enough' to report.

Bethany is required under Federal Title IX regulations to respond to incidents of sexual harassment as stated above. Additionally, conduct outlined in the above definitions of sexual harassment and sexual misconduct may be considered a violation of Indiana law and subject to mandatory reporting and/or criminal investigation

#### **D. Additional Information**

##### **1. Amnesty Provision**

The Bethany community encourages the reporting of sex discrimination, sexual misconduct, sexual harassment, and crimes by individuals. Sometimes, individuals are hesitant to report to seminary officials or participate in resolution processes because they fear that they themselves may be accused of policy violations. It is in the best interests of this community that as many individuals as possible choose to report to Bethany officials. To encourage reporting, Bethany pursues a policy of offering individuals amnesty from minor policy violations related to the incident.

##### **2. Confidentiality**

Bethany will keep confidential the identity of any individual who has made a report or complaint of sex discrimination, including any individual who has made a report or filed a formal complaint of sexual harassment, any complainant, any individual who has been reported to be the perpetrator of sex discrimination, any respondent, and any witness, except as may be permitted by the FERPA statute or regulations, 20 U.S.C. 1232g and 34 CFR part 99, or required by law, or to carry out the purposes of 34 CFR part 106, including the conduct of any investigation, hearing, or judicial proceeding arising thereunder.

##### **3. Disciplinary Sanctions & Remedies**

Respondents and complainants may be subject to the following disciplinary sanctions and remedies, respectively.

Disciplinary Sanctions: Respondents found responsible for sexual harassment misconduct and/or sexual harassment as defined in this policy may be subject to disciplinary sanctions at the conclusion of the appropriate grievance process.

Disciplinary sanctions may include, but are not limited to:

For student respondents:

- Warning
- Probation
- Suspension
- Expulsion
- Withholding Diploma
- Revocation of Degree
- Transcript Notation

- Organizational Sanctions
- Other Actions as Deemed Necessary

For employee respondents:

- Warning – Written or Verbal
- Performance Improvement Plan
- Required Counseling
- Required Training or Education
- Demotion
- Loss of Annual Pay Increase
- Suspension with or Without Pay
- Revocation of Tenure
- Termination

Remedies: Remedies are provided to the complainant and designed to restore or preserve their equal access to Bethany Seminary education program or activities. Remedies may be the same individualized services as described on in Section III.D as Supportive Measures. However, remedies do not need to be non-disciplinary or non-punitive and do not need to avoid burdening the respondent. Possible remedies include, but are not limited to:

- Educational programming
- Staff training
- Campus climate assessments.

The Title IX Coordinator is responsible for implementation of any remedies.

#### **4. False Accusations**

Bethany's Student and Employee Handbooks prohibit parties, including complainants, respondents, and witnesses, from knowingly making false statements or knowingly submitting false information during the grievance process.

Bethany reserves the right to discipline an individual for making a materially false statement in bad faith during the course of the grievance process, in accordance with the Bethany Student and Employee Handbooks. Such charges do not constitute retaliation on behalf of Bethany against the individual as the individual has violated Bethany's own policy.

#### **5. Jurisdiction of this Policy**

Any person may experience sex discrimination, sexual misconduct, or sexual harassment anywhere. Therefore, any individual may report any incident to the Title IX Coordinator. However, Bethany's response to such incidents is dependent upon the location of the alleged incident.

Process A: Title IX Formal Complaint & Grievance Process described in this policy must be applied when alleged incidents of sexual harassment as defined in Section III.C. of this policy occur in Bethany's own education program or activity (as defined in Section IV. of this policy) and in the United States.

Alleged incidents of sexual misconduct as well as incidents of sexual harassment which occur outside of Bethany's own education program or activity or outside of the United States, for example on a study abroad program, will be addressed using Process B: Sexual Misconduct Complaint Resolution Process.

Bethany's jurisdiction extends to electronic, digital, and online sexual harassment. Factual circumstances of electronic, digital, and online sexual harassment will be analyzed on a case-by-case basis to determine the context in which the harassment occurred. Such sexual harassment which occurs in an education program or activity as defined in Section IV. of this policy (in which Bethany exercises substantial control over the respondent and the context in which the harassment occurs) will be addressed using the Process A: Title IX Formal Complaint & Grievance Process. Incidents of electronic, digital, and online sexual misconduct or sexual harassment which occur outside of Bethany's own education program or activity are subject to Process B: Sexual Misconduct Complaint Resolution Process.

For clarification regarding incidents which occur on-campus versus off-campus, see the definition of Education Program or Activity in Section IV. of this policy.

## **6. Retaliation**

Bethany prohibits any person from intimidating, threatening, coercing, or discriminating against any individual for the purpose of interfering with any right or privilege secured by Title IX or its implementing regulations, or because an individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under Title IX and its implementing regulations or in the Bethany sexual misconduct complaint resolution process.

This retaliation provision may apply to any individual who has made a report or complaint of sex discrimination, including any individual who has made a report or filed a formal complaint of sexual harassment or sexual misconduct, any complainant, any individual who has been reported to be the perpetrator of sex discrimination, any respondent, any witness, or any other individuals who participate (or refuse to participate) in any manner in an investigation, proceeding, or hearing of Bethany's Title IX grievance process or sexual misconduct complaint resolution process. This policy includes protecting the complainant, respondent, and witnesses from being coerced, intimidated, threatened, or otherwise discriminated against based on their participation or refusal to participate in the Title IX grievance process or sexual misconduct complaint resolution process.

Retaliation includes intimidation, threats, coercion, or discrimination, including charges against an individual for code of conduct violations that do not involve sex

discrimination, sexual misconduct, or sexual harassment, but arise out of the same facts or circumstances as a report or complaint of sex discrimination, or report or formal complaint of sexual harassment or sexual misconduct, for the purpose of interfering with any right or privilege secured by Title IX or its implementing regulations.

Charging an individual with a Code of Conduct violation for making a materially false statement in bad faith in the course of the grievance process does not constitute retaliation. However, a determination regarding responsibility alone is not sufficient to conclude that an individual made a materially false statement in bad faith. A complainant's allegations may not have been false even where the ultimate determination is that the respondent is not responsible and/or that the complainant may not have acted subjectively in bad faith (and conversely, that a respondent may not have made false, or subjectively bad faith, denials even where the respondent is found responsible).

Exercising rights protected under the First Amendment does not constitute retaliation.

The parties have the right to discuss the allegations under investigation, but this right does not preclude Bethany from warning the parties not to discuss or disseminate the allegations in a manner that constitutes retaliation or unlawful tortious conduct. It is unacceptable for any person to leak or disseminate information to retaliate against another person.

#### **7. Right to an Advisor**

All parties are entitled to an advisor of their choosing to assist them throughout the Title IX grievance process as well as the sexual misconduct complaint resolution process. The advisor may be a friend, counselor, faculty member, family member, attorney or any other individual a party chooses to advise them who is eligible and available to serve during the grievance process. Any person who may be called as a witness may not serve as an advisor. Individuals seeking guidance about how to select an advisor may contact the Title IX Coordinator.

Parties are entitled to be accompanied by their advisor in all meetings, interviews, hearings, and appeals at which the party is entitled to be present during the grievance process.

During Process A: Title IX Formal Complaint & Grievance Process, parties are required to have an advisor present at the live hearing. If a party does not have an advisor available to be present at the live hearing, Bethany will provide the party with an advisor of Bethany's choice in Bethany's sole discretion, who may or may not be an attorney.

Bethany cannot guarantee equal advisory rights. Consequently, if one party selects an advisor who is an attorney, but the other party does not or cannot afford an attorney, Bethany is not obligated to provide an attorney or other advisor, except at the hearing. Bethany is not required to provide an attorney as an advisor at the hearing.

All advisors are subject to the same rules whether they are attorneys or not. Advisors may not present on behalf of their advisee in a meeting or interview. Advisors must conduct all cross-examination of the other party and all witnesses in a live hearing even if the advisee is not present at the live hearing.

Advisors should request or wait for a break in the interview, hearing, or meeting if they wish to interact with Bethany's Title IX personnel or Complaint Committee. Advisors may confer quietly with their advisees as necessary, as long as they do not disrupt the process. For longer or more involved discussions, the parties and their advisors should ask for breaks or step out of meetings to allow for private conversation.

Advisors may be given an opportunity to meet in advance of any interview or hearing with the Bethany Title IX personnel or the Complaint Committee during the grievance process.

Any advisor who fails to follow the guidelines established by Bethany in the grievance process will be provided an oral warning. If the advisor continues to disrupt or otherwise fails to follow those guidelines, the advisor will be asked to leave the proceeding. If an advisor is asked to leave, the meeting, interview, hearing or other proceeding will be suspended until the party advisor is reinstated; the party secures another advisor to accompany them at that meeting, interview, hearing or proceeding; or Bethany provides the party with another advisor for the hearing.

If an advisor is asked to leave a proceeding, the Title IX Coordinator will determine whether the advisor may be reinstated or must be replaced by a different advisor for the remainder of the grievance process.

The parties must advise the Title IX Coordinator of the identity of their advisor at least two (2) business days before the date of their first meeting with Title IX Coordinator and scheduled hearing. The parties must provide subsequent timely notice to the investigators if they change advisors at any time. No audio or video recording of any kind other than as required by institutional procedure is permitted during meetings with Bethany officials.

## **8. Supportive Measures**

Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the complainant and respondent without unreasonably burdening the other party.

Supportive measures are designed to:

- Restore or preserve equal access to the party's education at Bethany
- Protect the safety of all parties or Bethany's educational environment
- Deter sexual harassment.

Bethany's supportive measures include, but are not limited to:

- Counseling services

- Extensions of deadlines or other course-related adjustments
- Modifications of work or class schedules
- Campus escort services
- Mutual restrictions on contact between the parties
- Changes in work or housing locations
- Leaves of absence
- Increased security and monitoring of certain areas of the campus
- Placing an employee on paid or unpaid administrative leave
- Removing a student from campus housing and/or current classes
- Other similar measures as necessary

Bethany will offer supportive measures to every complainant when the Title IX Coordinator receives a report, complaint, or formal complaint of an incident of sex discrimination, sexual misconduct or sexual harassment. Examples of forms a report may include written or oral reports submitted by a complainant, Responsible Employee, anonymous reporting party, third-party reporter, or other Bethany community member.

Upon receiving a report, complaint, or formal complaint of an alleged incident of sex discrimination, sexual misconduct or sexual harassment, the Title IX Coordinator will promptly contact the complainant to discuss the availability of supportive measures and explain the option for filing a formal complaint as well as the formal complaint process under Process A: Title IX Formal Complaint & Grievance Process and/or Process B: Sexual Misconduct Complaint Resolution Process. The complainant will have the opportunity to express what they would like in the form of supportive measures, and the Title IX Coordinator will take into account the complainant's wishes in determining which supportive measures to offer. Supportive measures will be available to complainants regardless of whether or not they wish to file a formal complaint to initiate a grievance process or complaint to initiate Bethany complaint resolution procedures.

Supportive measures remain available to the complainant before and after filing a formal complaint of sexual harassment or a complaint of sexual misconduct as well as when no formal complaint or complaint has been filed. Additionally, Bethany will provide supportive measures to complainants even when the alleged incident does not constitute sexual harassment under Title IX, fall within the jurisdictional conditions under Title IX, or constitute sexual misconduct under this policy. For example, a complainant may still seek supportive measures when an incident of sexual harassment occurs outside of Bethany's education program or activity or outside of the United States. A complainant may request supportive measures when the alleged conduct is considered to be sexual misconduct under this policy but does not qualify as sexual harassment under Title IX.

Supportive measures may remain in place throughout an appeal process.

Regardless of the result of Process A: Title IX Formal Complaint & Grievance Process or Process B: Sexual Misconduct Complaint Resolution Process, Bethany reserves the

right to continue supportive measures. Therefore, if Bethany determines that a respondent is not responsible for violating Title IX, this policy, or other Bethany policies, Bethany may continue providing supportive measures to a complainant or respondent to restore or preserve equal access to their education.

Bethany adheres to Federal Title IX regulations, which require the equitable treatment of complainants and respondents. Equitable treatment under Title IX includes providing supportive measures and remedies for complainants and avoiding disciplinary action against respondents until the formal grievance process as outlined in this policy is completed. While respondents will be offered supportive measures, Title IX does not require equality or parity with respect to the supportive measures provided to complainants and respondents.

**Confidentiality & Supportive Measures:** Bethany will keep confidential any supportive measures provided to the complainant or respondent, to the extent that maintaining such confidentiality would not impair the ability of Bethany to provide the supportive measures. For example, where a no-contact order is appropriate, the respondent would need to know the identity of the complainant in order to comply with the no-contact order, or campus security is informed about the no-contact order in order to help enforce its terms. For more information about Confidentiality during the Title IX grievance process, see Section III.D. of this policy.

In order for Bethany to provide supportive measures to the complainant, Bethany must know the identity of the complainant. Therefore, it is not possible for the complainant to remain anonymous and receive supportive measures because at least one school official (such as the Title IX Coordinator) must know the complainant's identity in order to offer and implement any supportive measures. A complainant or third party may desire to report sexual harassment without disclosing the complainant's identity—and may do so using the reporting options detailed in Section V. of this policy—but Bethany will be unable to provide supportive measures in response to the report without knowing the complainant's identity.

**Implementation of Supportive Measures:** The Title IX Coordinator is responsible for coordinating the effective implementation of supportive measures. Although supportive measures may require collaboration with various Departments on campus, the Title IX Coordinator will serve as the point of contact for complainants and respondents.

### **Emergency Removal**

Bethany reserves the right to remove a respondent from a Bethany education program or activity without undergoing a grievance process on an emergency basis if Bethany undertakes an individualized safety and risk analysis and determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal.

In the event of emergency removal, Bethany will provide the respondent with post-removal notice and the opportunity to challenge the decision immediately following the removal.

### **Administrative Leave**

Bethany reserves the right to place all non-student employee respondents on administrative leave during the pendency of a grievance process outlined in this policy.

### **IV. Definitions**

The following terms are related to the grievance processes outlined in Section VI. Grievance Processes.

**Actual Knowledge:** Notice of sexual harassment or allegations of sexual harassment delivered to Bethany's Title IX Coordinator. Such notice may be written or verbal and includes reports sent to the Title IX Coordinator in person, by mail, by telephone, by email, telephone call, in-person, or any other means that result in the Title IX Coordinator receiving a person's written or verbal report.

**Advisor:** An individual who provides support, guidance, and/or assistance to the complainant or responding party throughout the investigation, hearing, appeals, and/or informal resolution process. Complainants and respondents have the right to select an advisor of their choice. Advisors may be a friend, mentor, family member, attorney, or any other supporter a party chooses to advise them who is both eligible and available. Advisors are required during the hearing process. If a party does not have an advisor present at the hearing process, Bethany will provide the party with an advisor. Additional information about the role of advisors can be found in Section III.D. of this policy.

**Complaint:** A document that initiates Process B: Sexual Misconduct Complaint Resolution Process against a respondent alleging sexual misconduct. For more information about how to file a complaint, see Section VI. of this policy.

**Complainant:** An individual who is alleged to be the victim of conduct that could constitute sexual harassment. A complainant may, but is not required to be, a student, employee, or other Bethany community member.

**Consent:** Sexual permission. Consent can be given by word or action, but non-verbal consent is not as clear as talking about what you want sexually and what you don't. Consent to some form of sexual activity cannot be automatically taken as consent to any other form of sexual activity. Previous consent does not imply consent to sexual activity in the future. Silence or passivity—without actions demonstrating permission—cannot be assumed to show consent. Consent, once given, can be withdrawn at any time. There must be a clear indication that consent is being withdrawn.

A person is unable to give consent if: (1) the victim is compelled by force or imminent threat of force; (2) the victim is unaware that the sexual intercourse or other sexual



conduct is occurring; or (3) the victim is so mentally disabled or deficient that consent to sexual intercourse or other sexual conduct cannot be given.

Capacity to consent presupposes an intelligence capable of understanding the act, its nature, and possible consequences.

**Education Program or Activity:** All the operations of Bethany, which may be on or off campus, as well as locations, events, or circumstances over which Bethany exercises substantial control over both the respondent and the context in which an incident of sexual harassment occurs. Title IX requires Bethany to investigate formal complaints alleging sexual harassment that occurred in housing owned or held by the institution.

Bethany's education program or activity also extends to operations which include computer and internet networks, digital platforms, and computer hardware or software owned or operated by, or used in the operations of Bethany.

**Formal Complaint:** A document that initiates Process A: Title IX Formal Complaint & Grievance Process, as outlined in Section VI. of this policy against a respondent alleging Title IX sexual harassment. A formal complaint must be filed by the complainant or signed by the Title IX coordinator alleging sexual harassment against a respondent and requesting that Bethany investigate the allegation of sexual harassment. At the time of filing a formal complaint, the complainant must be participating in or attempting to participate in an education program or activity at Bethany. A formal complaint may be a document delivered to the Title IX Coordinator's office or electronic submission sent via email which contains the complainant's physical or digital signature, or otherwise indicates that the complainant is the person filing the complaint.

Submission of a formal complaint to Bethany is not equivalent to filing charges with local law enforcement and does not require a complainant to file charges with local law enforcement. For more information about reporting incidents of sexual misconduct or sexual harassment to local law enforcement, see Section V. of this policy.

**Report:** Notice, either written or oral, provided to the Title IX Coordinator of an alleged incident of sex discrimination, sexual harassment, or sexual misconduct. Any person, regardless of whether or not the person reporting the alleged incident is the person alleged to be the victim the incident may report sex discrimination, sexual misconduct or sexual harassment. Reports may be made at any time, including during non-business hours, in person, by mail to the office address listed for the Title IX Coordinator, by telephone, by email, or any other means that result in the Title IX Coordinator receiving a person's written or verbal report. Individuals may also download and submit an Incident Report by email, mail, or in person directly to the Title IX Coordinator. A report is distinguished from a formal complaint or complaint as defined above.

**Respondent:** An individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment or sexual misconduct.

Responsible Employees: Employees who have been given the duty of reporting incidents of sexual violence or any other misconduct by members of the Bethany community (students, staff, faculty, guests, visitors) to the Title IX Coordinator or other appropriate Bethany designees, or whom a reporting party could reasonably believe have this authority or duty. Responsible Employees who receive information or a report about any act that potentially constitutes sexual misconduct or sexual harassment must further report that information to the Title IX Coordinator.

The following employees of Bethany are Responsible Employees: faculty, staff, Resident Advisors, and Graduate Assistants. Employees who are also ordained ministers are considered Responsible Employees and are still obligated to report sex discrimination, sexual misconduct, and sexual harassment to the Title IX Coordinator. Responsible Employees are expected to make every effort to explain their duty to report to anyone disclosing, or about to disclose, information to them.

Preponderance of the Evidence: The standard of evidence used to determine if a Title IX policy violation occurred. Bethany uses a “preponderance of the evidence” standard, which means that the evidence collected and presented during the grievance process demonstrates that it is more likely than not that the alleged conduct or policy violation occurred.

Supportive Measures: Non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the complainant or respondent before or after the filing of a formal complaint or where no formal complaint has been filed. Such measures are designed to restore or preserve equal access to Bethany’s education programs or activities without unreasonably burdening the other party, including measures designed to protect the safety of all parties or Bethany’s educational environment, or deter sexual harassment. Supportive Measures are described in further detail in Section III.D. of this policy.

#### **V. Reporting Sex Discrimination, Sexual Misconduct & Sexual Harassment**

Any person may report an incident(s) of sex discrimination, sexual misconduct, or sexual harassment to the Title IX Coordinator. The reporting party may be the person directly affected by the alleged incident (referred to as “complainant”) or a third party. Reports of sex discrimination, sexual misconduct, and sexual harassment may be written or verbal and may be made at any time (including non-business hours) in person, by using the telephone number or email address, or by mail to the office address, of the Title IX Coordinator. Individuals may also submit an Incident Report by email, mail, or in person directly to the Title IX Coordinator.

Bethany’s Title IX Coordinator contact information is as follows:

Steven Schweitzer  
Academic Dean, Professor & Title IX Coordinator  
615 National Road W.

Richmond, IN 47374  
Phone: 765-983-1829  
Email: titleix@bethanyseminary.edu

When the Title IX Coordinator receives notice through a report (either written or oral), complaint, or formal complaint of an alleged incident of sex discrimination, sexual misconduct, or sexual harassment, the Title IX Coordinator will promptly contact the complainant to:

- A. Discuss the availability of Supportive Measures, as defined on in Section III.D. of this policy
- B. Consider the complainant's wishes with respect to supportive measures
- C. Inform the complainant of the availability of supportive measures with or without filing a complaint or formal complaint
- D. Explain to the complainant:
  - i. Bethany's procedures for handling non-sexual harassment sex discrimination
  - ii. Process for filing a formal complaint under Title IX to initiate Process A: Title IX Formal Complaint & Grievance Process
  - iii. Process for filing a complaint and initiating Process B: Sexual Misconduct Complaint Resolution Process.

The Title IX Coordinator will conduct a preliminary assessment of the report, complaint, or formal complaint to assist the complainant in determining which grievance process or procedures the complainant may initiate. For more information about the Preliminary Assessment, see Section V.A. of this policy.

In addition to reporting an incident of sex discrimination, sexual misconduct, or sexual harassment to the Title IX Coordinator, individuals have the following reporting options:

i. **Reporting to a Responsible Employee**

A person may report an alleged incident of sex discrimination, sexual misconduct, or sexual harassment to a Bethany Responsible Employee, as defined in Section IV. of this policy. Responsible Employees must report the alleged incident to the Title IX Coordinator or appropriate Bethany designees. After reporting the alleged incident to the Title IX Coordinator, the Title IX Coordinator will contact the complainant.

Note: Employees who are also ordained ministers are considered Responsible Employees and are still obligated to report sex discrimination, sexual misconduct, and sexual harassment to the Title IX Coordinator. Individuals wishing to seek confidential support are encouraged to see Chaplains or members of the clergy who have that specific role on campus. Responsible Employees are expected to make every effort to explain their duty to report to anyone disclosing, or about to disclose, information to them.

ii. **Anonymous Reporting**

Bethany permits anonymous parties to report alleged incidents of sex discrimination, sexual misconduct, and/or sexual harassment by telephone or by mail to the office of the Title IX Coordinator.

If the anonymous report contains the identity of the complainant, upon receipt of the report, the Title IX Coordinator will contact the complainant to offer supportive measures and explain the process for filing a formal complaint. However, if the anonymous report does not contain the identity of the complainant, Bethany will be unable to contact the complainant to offer supportive measures. While the Title IX Coordinator will keep confidential complainant's identity (unless disclosing the complainant's identity is necessary to provide supportive measures for the complainant, such as issuing no-contact orders), the Title IX Coordinator must know the identity of the complainant to offer such supportive measures.

iii. **Reporting to the Richmond, IN Police Department**

Bethany encourages anyone who has experienced sexual misconduct or sexual harassment to pursue criminal action for incidents that may also be crimes under applicable criminal statutes. Law enforcement officers are trained in handling sexual assault and other cases involving sexual misconduct and harassment. Reporting to law enforcement does not require prosecution of the offense and the reporting party's wishes will be taken into account by law enforcement. The police report and any supporting evidence may be turned over to the Indiana State's Attorney's Office, which decides whether there is sufficient evidence to prosecute. Information about the law enforcement process of reporting, the investigation, arrests, filing of charges, hearings, the trial and sentencing will be explained at the time of the report. Bethany employees will assist the reporting party in contacting local law enforcement, if explicitly requested by the reporting party. However, reporting an incident of sexual misconduct or sexual harassment to Bethany does not in any way equate to reporting the incident to local law enforcement. An individual may decide to report an incident exclusively to Bethany, exclusively to local law enforcement, or to both Bethany and local law enforcement.

Should an individual report an incident of sexual misconduct or sexual harassment to both Bethany and local law enforcement, Bethany will comply with law enforcement requests for cooperation. Such cooperation may require Bethany to temporarily suspend its own investigation into the alleged incident while local law enforcement gathers evidence. During this time, Bethany will continue to offer supportive measures to the complainant. As soon as local law enforcement or Bethany determines that a delay is no longer necessary, Bethany will promptly resume its Title IX or Code of Conduct investigation.

Bethany's policy, definitions, and standard of proof differ from Indiana criminal law. Neither law enforcement's determination whether to prosecute a respondent nor the outcome of any criminal prosecution will determine whether sexual misconduct or sexual harassment has occurred under this policy. Proceedings under this policy may

be carried out prior to, simultaneously with or following civil or criminal proceedings off campus.

Contact Information for the Richmond, IN Police Department:

Non-emergency line: (24 hours a day, M–F): (765) 983-7247

Address: 50 N. 5th St., Richmond, IN 47374

#### **A. Preliminary Assessment**

Upon receiving a report, complaint or formal complaint of an alleged incident of sex discrimination, sexual misconduct, or sexual harassment, the Title IX Coordinator will conduct a preliminary assessment to determine Bethany’s response using the following threshold criteria:

1. Would the incident be considered “sexual harassment” under Title IX, as defined in Section III.C. of this policy?
  - a. In assessing the type of incident, the Title IX Coordinator will determine if the alleged conduct was either:
    - i. Quid pro quo harassment (involving a Bethany employee);
    - ii. Sexual Assault, Dating Violence, Domestic Violence, or Stalking; or
    - iii. Unwelcome conduct that is so severe, pervasive, and objectively offensive that it effectively denies a person equal access to Bethany program or activity.
2. Did the incident occur in Bethany’s education program or activity, as defined in Section IV. of this policy?
3. Did the incident occur in the United States?

If the answer is “no” to any of these questions, the alleged incident may be considered one or more of the following forms of conduct and addressed accordingly:

1. Non-sexual harassment sex discrimination: Bethany’s grievance procedures will follow the same process using Process B: Sexual Misconduct Complaint Resolution Process.
2. Sexual Misconduct: Incidents of sexual misconduct will be addressed using Process B: Sexual Misconduct Complaint Resolution Process.
3. Non-actionable: Complainant may request, and Bethany may provide, supportive measures as appropriate.

If the answer is “yes” to all three threshold criteria, the incident may constitute sexual harassment under Title IX, and the complainant may file a formal complaint under Title IX to initiate an investigation and grievance process, as outlined in Process A: Title IX Formal Complaint & Grievance Process.

After conducting the assessment, the Title IX Coordinator will send a written notification of their preliminary assessment to the complainant.

The complainant may appeal the Title IX Coordinator's preliminary assessment of the alleged incident to Bethany's President within 10 days of receiving written notice from the Title IX Coordinator. If a formal complaint or complaint is filed, the respondent may appeal the Title IX Coordinator's preliminary assessment to Bethany's President within 10 days of receiving the notice of the complaint.

Complainants may request supportive measures or an investigation into allegations of conduct that do not meet Title IX jurisdictional conditions, under Process B: Sexual Misconduct Complaint Resolution Process.

Regardless of whether an alleged incident is determined to constitute sexual harassment, sexual misconduct, or sex discrimination, and regardless of whether or not the complainant files a formal complaint under Title IX or a complaint to initiate the sexual misconduct complaint resolution process, Bethany will provide supportive measures to the complainant. For more information about Supportive Measures, see Section III.D. of this policy.

#### **VI. Grievance Processes**

Upon completion of the preliminary assessment by the Title IX Coordinator, a complainant may decide to proceed with a formal investigation and grievance process.

Complainants alleging sexual harassment under Title IX may file a formal complaint to proceed with Process A: Title IX Formal Complaint & Grievance Process, whereas complainants alleging sexual misconduct may initiate Process B: Sexual Misconduct Complaint Resolution Process.

If you are unsure as to which process corresponds to the alleged prohibited conduct, refer to the Preliminary Assessment information in Section V.A. of this policy and/or contact the Title IX Coordinator for clarification.

If at any time during the investigation and grievance process in Process A: Title IX Formal Complaint & Grievance Process, the Title IX Coordinator determines that the alleged sexual harassment no longer falls within the jurisdictional criteria of Title IX, the allegation may be addressed under Process B: Sexual Misconduct Complaint Resolution Process.

Conversely, if it is determined during the investigation and complaint resolution process in Process B: Sexual Misconduct Complaint Resolution Process that the alleged incident would constitute sexual harassment under Title IX, the complaint will be addressed under Process A: Title IX Formal Complaint & Grievance Process.

The Title IX Coordinator will provide the parties with written notice simultaneously in the event that the grievance process used to handle the complaint of sexual misconduct or formal complaint of sexual harassment must be changed.

## **General Information about Bethany Grievance Processes**

Bethany will treat complainants equitably by providing the complainant and respondent with supportive measures throughout the appropriate grievance process, following the grievance process before imposing any disciplinary sanctions (or other actions that are not supportive measures) against a respondent, and providing remedies to a complainant where a determination of responsibility for sexual harassment or sexual misconduct has been made against a respondent.

Bethany's grievance process relies upon an objective evaluation of all relevant evidence—including both inculpatory and exculpatory evidence. Bethany applies the preponderance of the evidence standard, which means that the evidence collected and presented during the grievance process demonstrated that it is more likely than not that the alleged conduct or policy violation occurred. Bethany applies the same standard of evidence for formal complaints against students and employees, including faculty, and applies the same standard of evidence to all formal complaints of sexual harassment.

Determination of a party's credibility will not be based on a person's status as a complainant, respondent, or witness. Bethany presumes that the respondent is not responsible for the alleged conduct until a determination regarding responsibility at the conclusion of the grievance process.

All Bethany employees involved in the Title IX investigation and grievance process have received the appropriate training to participate in the Title IX grievance process, and training materials have been made publicly available on Bethany's website. Training topics include, but are not limited to, the definition of sexual harassment under Title IX, steps to conducting a Title IX investigation and grievance process, and how to serve impartially, including by avoiding prejudgment of facts, conflicts of interest, and bias.

If a complainant or respondent considers Bethany's treatment of a formal complaint of sexual harassment to constitute discrimination on the basis of sex under Title IX, they may file a report of sex discrimination with the Title IX Coordinator.

## **Conflicts of Interest**

Bethany employees participating in Process A: Title IX Formal Complaint & Grievance Process as well as Process B: Sexual Misconduct Complaint Resolution Process, including the Title IX Coordinator, investigators, decision-makers, informal resolution facilitators, and Complaint Committee members as well as external parties employed by Bethany to complete Title IX investigation and adjudication functions (hearings, appeals, and informal resolution options) are prohibited from having a conflict of interest or bias for or against complainants or respondents generally or as an individual complainant or respondent.

To avoid potential conflicts of interest, Bethany may provide the names and titles of internal and external Title IX investigators and adjudicators or the Complaint Committee members to the parties at the initiation of the investigation, informal resolution process, or hearing. Such information will be provided no less than five (5) days before any

meeting or hearing between the party and the investigator, adjudicator, or Complaint Committee. The complainant or respondent may request the removal of an investigator, adjudicator, or Complaint Committee member on the grounds of personal bias or other conflicts of interest by submitting a written statement to the Title IX Coordinator setting forth the basis for the request no more than three (3) days after receiving notice of the identity of the individual involved in the grievance process. The Title IX Coordinator will review the written statement and make a determination if there is a conflict of interest. Appropriate steps will be taken to ensure that no conflict of interest exists on the part of anyone involved in the Title IX investigation, hearing, appeals, or informal resolution processes or the Bethany Complaint Resolution Process. If a conflict of interest exists, another individual will be assigned to the appropriate role. If a conflict of interest exists between the complainant or respondent and the Title IX Coordinator, reports should be directed to the Bethany Seminary President.

### **Timelines for the Grievance Process**

Bethany aims to complete the appropriate grievance process, including appeals and informal resolution processes, in a reasonably prompt time frame. Generally, Bethany will conclude the grievance process within ninety (90) days.

Bethany reserves the right to allow for the temporary delay of the grievance process or the limited extension of time frames for good cause with written notice to the complainant and the respondent of the delay or extension and the reasons for the action. Good cause may include considerations such as the absence of the party, a party's advisor, or a witness; concurrent law enforcement activity; or the need for language assistance or accommodation of disabilities.

### **Process A: Title IX Formal Complaint & Grievance Process**

The following information pertains to complaints of sexual harassment under Title IX, as defined in Section III.C. of this policy.

#### **i. FILING A FORMAL COMPLAINT UNDER TITLE IX**

Filing of a formal complaint of an alleged incident of sexual harassment under Title IX initiates the investigation and grievance process outlined on pages 26-33 of this policy.

### **Who Can File a Formal Complaint?**

The complainant or Title IX Coordinator must file the formal complaint.

Third parties cannot file formal complaints. Additionally, fundamental fairness and due process principles require that a respondent be informed of the details of the allegations made against them, to the extent that the details are known, to provide an adequate opportunity for the respondent to respond. Therefore, a complainant cannot remain anonymous and file a formal complaint. However, the Title IX Coordinator will keep confidential the identities of the complainant and respondent (and witnesses) from anyone not involved in the grievance process, except as permitted by FERPA, required by law, or as necessary to conduct the grievance process. For more information about confidentiality, see Section III.D. of this policy.



While a formal complaint requires the complainant's identity, Title IX does not require a complainant to identify the respondent in a formal complaint. If a complainant does not know the respondent's identity and files a formal complaint, Bethany is still required to investigate the formal complaint because an investigation may reveal the respondent's identity. If the respondent's identity becomes known, Bethany will send both parties the written notice of allegations, follow the grievance process outlined in this policy, and may impose disciplinary sanctions against the respondent at the conclusion of the grievance process. However, if a respondent's identity remains unknown, Bethany will be unable to comply with the required grievance process outlined in this policy and therefore unable to impose disciplinary sanctions against the respondent.

Under certain circumstances, the Title IX Coordinator may determine that an investigation is necessary, even when the identity of the complainant is unknown, or the complainant does not want an investigation. In this case, the Title IX Coordinator may choose to sign a formal complaint and initiate the grievance process. When this occurs, the Title IX Coordinator is not a complainant or otherwise considered a party included in the grievance process. The alleged victim will remain the complainant and be treated as a party in the grievance process. However, the complainant is not required to participate in the grievance process.

#### **How to File a Formal Complaint:**

Formal complaints may be submitted in person, by mail, or by email to the Title IX Coordinator, whose contact information is listed in Section II. of this policy.

Formal complaints cannot be filed by telephone.

You can access the Formal Complaint form on the Bethany website.

#### **What is a Formal Complaint?**

A formal complaint is a document or electronic submission (such as an email) that contains the complainant's physical or digital signature or otherwise indicates that the complainant is the person filing the complaint.

A formal complaint alleges sexual harassment against a respondent and requests that Bethany investigate the allegation of sexual harassment. Therefore, submitting a formal complaint indicates an intentional decision on behalf of the complainant to initiate the Title IX grievance process.

#### **When Can a Formal Complaint be Filed?**

There is no time limit on a complainant's decision to file a formal complaint, so the decision to sign and file a formal complaint does not need to occur in the immediate aftermath of an alleged incident or reporting an incident.

However, at the time of filing a formal complaint, the complainant must be participating in or attempting to participate in Bethany's education program or activity.

This requirement does not exclude a complainant who has graduated or is on a leave of absence if the complainant intends to apply to a different Bethany Seminary program, intends to remain involved in Bethany's alumni programs and activities, or may intend to re-apply after a leave of absence.

### **Dismissal of a Formal Complaint**

The investigation of the conduct alleged in the formal complaint may uncover new information about the incident. In accordance with Title IX, Bethany must dismiss the formal complaint of sexual harassment under Title IX if at any point during the investigation or hearing process it is determined that the conduct alleged in the formal complaint:

1. Would not constitute sexual harassment as defined under Title IX (defined in Section III.C. of this policy), even if proven
2. Did not occur in Bethany's education program or activity; or
3. Did not occur against a person in the United States.

Such dismissal does not indicate that a Bethany policy violation did not occur. Therefore, Bethany may choose to address such incidents using the grievance procedures outlined in Process B: Sexual Misconduct Complaint Resolution Process.

Bethany reserves the right to dismiss a formal complaint or allegations therein, if at any time during the investigation or hearing:

1. A complainant notifies the Title IX Coordinator in writing that the complainant would like to withdraw the formal complaint or any allegations therein
2. The respondent is no longer enrolled or employed by Bethany
3. Specific circumstances prevent Bethany from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein.

Upon dismissal of a formal complaint (either as required or not), Bethany will promptly send a written notice of dismissal and reason(s) therefor simultaneously to both parties.

The complainant and respondent have the right to appeal Bethany's dismissal of the formal complaint or any allegations therein on several bases. For more information about the bases of appeal, see page 31 of this policy.

### **Consolidation of Formal Complaints**

Bethany may consolidate formal complaints as to allegations of sexual harassment against more than one respondent, or by more than one complainant against one or

more respondents, or by one party against another party, where the allegations of sexual harassment arise out of the same facts or circumstances. Where a grievance process involves more than one complainant or more than one respondent, references in this policy to the singular “party,” “complainant,” or “respondent” include the plural, as applicable.

ii. GRIEVANCE PROCESS FOR FORMAL COMPLAINTS OF SEXUAL HARASSMENT  
The following grievance process complies with 34 CFR § 106.45 of Title IX. All processes, provisions, and rules stated in this policy apply equally to both parties—complainants and respondents.

a) Written Notice

Upon receipt of a formal complaint, Bethany will provide a written notice of allegations to both parties, if known, simultaneously. The notice includes the following information:

- A. Notice of the allegation of sexual harassment, as defined in Section III.C. of policy, containing sufficient details known at the time, including:
  - a. Identities of the parties involved in the incident (if known)
  - b. Conduct allegedly constituting a policy violation
  - c. Date and location of the alleged incident (if known).
- B. Sufficient time for each party to prepare a response before any initial interview.
- C. Explanation of each party’s right to an advisor of their choice, who may be, but is not required to be, an attorney. The advisor may participate during the grievance process, subject to limitations established by Bethany. For more information about advisors, see Section III.D. of this policy.
- D. Explanation of each party’s right to inspect and review all evidence gathered during the investigation.
- E. Reference to the sections of this policy and the Bethany Student and Employee Handbooks which prohibit knowingly making false statements or knowingly submitting false information during the grievance process.
- F. Statement that the respondent is presumed not to be responsible for the alleged conduct unless and until a determination of responsibility is final.
- G. Statement that a determination of responsibility will be made at the conclusion of the grievance process.

H. Provide a copy of Bethany Policy on Sexual Misconduct & Sexual Harassment, which outlines the grievance process utilized to address alleged incidents of sexual harassment under Title IX.

I. List of on-campus and off-campus support resources for complainants.

If, during the investigation, Bethany decides to investigate allegations about the complainant or respondent that are not included in the initial notice provided to the parties, Bethany will provide written notice of the additional allegations to the parties whose identities are known.

b) Investigation of Formal Complaints

Bethany is obligated to investigate formal complaints of sexual harassment. Bethany will complete the Title IX investigation within thirty (30) days, excluding weekends and holidays. Bethany will inform the parties of the name and title of the assigned investigator in the written notices of investigative interview issued to the parties.

### **Role of Bethany Seminary & the Parties**

During the investigation, the burden of proof and the burden of gathering evidence sufficient to reach a determination regarding responsibility rest on Bethany Seminary and not on the parties.

Both parties are provided with an equal opportunity to present witnesses, including fact and expert witnesses, and other inculpatory and exculpatory evidence during the grievance process. Bethany will not restrict the ability of either party to discuss the allegations under investigation or to gather and present relevant evidence.

Bethany is prohibited from accessing, considering, disclosing, or otherwise using a party's records that are made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in the professional's or paraprofessional's capacity, or assisting in that capacity, and which are made and maintained in connection with the provision of treatment to the party, unless Bethany obtains the party's voluntary, written consent to do so for the grievance process outlined in this policy.

### **Participation of the Parties in the Investigation Process**

Bethany will provide written notice to a party who is invited and expected to participate in any investigative interviews, hearings, or other meetings. This written notice will include the date, time, location, names of participants, and purpose of the meeting and be provided not less than five (5) days prior to the meeting, providing the party with sufficient time to prepare.

Parties may not attend interviews of any other party or witness, or any meeting or hearing related to the investigation, unless invited and expected to participate by Bethany.

Prior to completion of the investigative report at the conclusion of the investigation, all parties can have not more than one other person present during any grievance proceeding, including the opportunity to be accompanied to any grievance-related meeting or proceeding by an advisor of their choice, who may be an attorney. A party may only be accompanied by their advisor during the live hearing. Bethany does not limit the choice or presence of advisor for either the complainant or respondent in any meeting or grievance proceeding, including investigative interviews. However, Bethany reserves the right to establish restrictions regarding the extent to which the advisor may participate in the proceedings, which will apply equally to both parties. For more information about rights to an advisor, see Section III.D. of this policy.

All parties and their advisors will be given an equal opportunity to inspect and review all evidence gathered during the investigation that is directly related to the allegations raised in the formal complaint, including evidence upon which Bethany does not intend to rely in reaching a determination regarding responsibility as well as inculpatory and exculpatory evidence, regardless of the source. The evidence subject to inspection and review will be provided either in electronic format or hard copy to the parties and their advisors, if any. The parties will have ten (10) days to submit a written response regarding the investigation evidence. The investigator will consider the parties' responses prior to completion of the investigative report.

Bethany may redact confidential portions of the investigation file or require the parties and their advisors to execute nondisclosure agreements to preserve the confidentiality of confidential information prior to release of the investigation file to the parties and their advisors.

All the evidence which was provided to the parties for inspection and review will be made available at any hearing related to the formal complaint to provide each party the equal opportunity to refer to such evidence during the hearing, including for purposes of cross-examination.

The parties may submit any additional evidence prior to the investigator finalizing the investigative report with a copy provided to the other party and their advisor.

### **Investigative Report**

The Title IX investigator will create an investigative report that fairly summarizes relevant evidence.

Upon completion, investigator will send the investigative report to each party and the party's advisor, if any, at least ten (10) days prior to a scheduled hearing, in electronic format or hard copy. Upon review, the parties may submit a written response to the decision-maker not less than five (5) days prior to the scheduled hearing, with a copy to the other party and their advisor. The other party may submit a written reply to the written response at least two (2) days prior to the scheduled hearing, with a copy to the other party and their advisor.

The investigator may include recommended findings or conclusions in the investigative report, but the decision-maker is under an independent obligation to objectively evaluate relevant evidence in making a determination.

c) **Hearing Process**

Live hearings are a mandatory part of the Title IX grievance process. Generally, the decision-maker will be the Bethany Seminary President. However, when deemed necessary, a panel of hearing officers may act as the decision-maker(s) at Bethany Title IX hearings. The decision-maker must not be the same person as the Title IX Coordinator or investigator. Bethany will provide specific procedural rules for the live hearing to the parties and their advisors at least 10 (ten) days prior to the scheduled hearing.

Live hearings may be conducted with all parties physically present in the same geographic location. In this instance, at the request of either party, Bethany will arrange for the live hearing to occur with the parties located in separate rooms with technology enabling the decision-maker(s) and the parties to simultaneously see and hear the party or witness answering the questions.

Bethany also reserves the right to require or permit any or all parties, witnesses and other participants to appear at the live hearing virtually, with technology enabling participants to simultaneously see and hear each other.

Bethany will create an audio recording, audiovisual recording, or transcript of any live hearing and make it available to the parties for inspection and review.

Both parties have the right to present relevant fact and expert witnesses as well as inculpatory and exculpatory evidence at the hearing. A written summary of any evidence not included in the investigation file should be provided to the decision-maker and the other party and their advisor no less than five (5) days prior to the hearing.

**Cross-Examination**

During the live hearing, the decision-maker will permit each party's advisor to ask the other party and any witnesses any relevant questions and follow-up questions, including questions which challenge credibility.

Cross-examination at the live hearing must be conducted directly, orally, and in real time by the party's advisor, and cross-examination may never be conducted by a party personally.

Only relevant cross-examination and other questions may be asked of a party or witness. Before a complainant, respondent, or witness answers a cross-examination or other question, the decision-maker(s) must first determine whether the question is relevant and explain any decision to exclude a question as not relevant.

Questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant, unless: 1.) such questions and evidence about the complainant's prior sexual behavior are offered to prove that someone other than the respondent committed the conduct alleged by the complainant; or 2.) if the questions and evidence concern specific incidents of the complainant's prior sexual behavior with respect to the respondent and are offered to prove consent.

If a party or witness does not submit to cross-examination at the live hearing, the decision-maker(s) may not rely on any statement of that party or witness in reaching a determination regarding responsibility. However, the decision-maker(s) may not draw an inference about the determination regarding responsibility based solely on a party's or witnesses' absence from a live hearing or refusal to answer cross-examination or other questions.

### **Hearings & Advisors**

Apart from the advisor's role in cross-examination, Bethany reserves the right to restrict the extent to which advisors may participate in the proceedings.

If a party does not have an advisor present at the live hearing, Bethany will provide, without fee or charge to that party, an advisor of Bethany's choice to conduct cross-examination on behalf of that party. The advisor may be, but is not required to be, an attorney.

Bethany will include details regarding the role of the advisors in the hearing procedural rules provided to the parties at least five (5) days prior to the scheduled hearing.

#### **d) Determination Regarding Responsibility**

Following the live hearing, the decision-maker(s) will issue a written determination. To reach the determination, the decision-maker(s) will apply the preponderance of the evidence standard of evidence, as defined in Section IV. of this policy.

The decision-maker(s) will issue the written determination to the parties simultaneously generally no more than ten (10) days after the conclusion of the live hearing. Copies will be sent to the parties and their advisors by email, certified mail, or overnight delivery service such as Federal Express, with receipt of acknowledgement.

The written determination will include the following information:

- A. Identification of the allegations potentially constituting sexual harassment, as defined in Section III.C. of this policy.
- B. A description of the procedural steps taken from the receipt of the formal complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather evidence, and hearings held

- C. Findings of fact supporting the determination
- D. Conclusions regarding the application of this policy and/or the Bethany Student and/or Employee Handbooks to the facts
- E. A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility, any disciplinary sanctions to be imposed on the respondent, and whether remedies designed to restore or preserve equal access to Bethany's education program or activity will be provided by Bethany to the complainant and
- F. Bethany's procedures and permissible bases for the complainant and respondent to appeal.

The determination is final either:

- 1. On the date Bethany provides the parties with the written determination of an appeal, if an appeal was filed or
- 2. The date for filing an appeal expires without an appeal having been filed.

e) Appeals

Either complainant or respondent may file a written notice of appeal of a determination of dismissal of a formal complaint within five (5) days after receiving the written determination or notice of dismissal. The notice of appeal must be delivered to the Title IX Coordinator within such 5-day period by email, personal delivery, certified mail or overnight delivery service.

A party may appeal from a) determination regarding responsibility, and b) Bethany's dismissal of a formal complaint or any allegations therein, on the following bases:

- A. Procedural irregularity that affected the outcome of the process
- B. New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the process and
- C. The Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the process.

If a party files an appeal, the appeal decision-maker(s) will generally be the Chair of the Board of Trustees. The appeal decision-maker will be free of bias as well as conflict of interest and will not be the Title IX Coordinator, investigator involved in the investigation, or decision-maker who reached the determination regarding responsibility or dismissal. The appeal decision-maker will have received required training under Title IX.



Bethany will notify the other party in writing when an appeal is filed and implement appeal procedures equally for both parties, including a reasonable, equal opportunity to submit a written statement in support of, or challenging, the outcome.

The appealing party must submit a statement to the appeal decision-maker in support of the appeal within five (5) days of filing the notice of appeal with a copy to the other party and their advisor. Although the other party is not obligated to respond to the appealing party, should the other party wish to respond, the other party must submit a written response to the statement filed by the appealing party to the appeal decision-maker within five (5) days of receipt of the appealing party's statement with a copy to the other party and their advisor.

No oral arguments will be held on the appeal unless so directed by the appeal decision-maker, in which case both parties' advisors will be given an equal opportunity to present oral arguments.

The appeal decision-maker will issue a written decision simultaneously to both parties, describing the result and the rationale of the decision generally within ten (10) days of receiving the final written statements from the parties.

f) Informal Resolutions

At any time following the filing of a formal complaint and prior to reaching a determination regarding responsibility, Bethany offers complainants and respondents informal resolution options such as mediation, restorative justice, or other forms of alternative dispute resolution, which do not involve or require a full investigation and adjudication (hearing process).

For Bethany to proceed with informal resolution options, Bethany will:

- A. Provide the parties with a written notice disclosing the following:
  - iii. The allegations
  - iv. The requirements of the informal resolution process, including the circumstances under which the informal resolution process would preclude the parties from resuming a formal complaint arising from the same allegations, provided, however, that at any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the grievance process with respect to the formal complaint and
  - v. Any consequences resulting from participating in the informal resolution process, including the records that will be maintained or could be shared
- B. Obtain voluntary, written consent from the parties to the informal resolution process.

Bethany will provide the parties with the specific guidelines corresponding to the various informal resolution options prior to the parties signing a written consent to the informal resolution process.

Bethany is prohibited from offering informal resolution options in cases which involve a Bethany employee's sexual harassment of a student.

Bethany is prohibited from requiring as a condition of enrollment or continuing enrollment, or employment or continuing employment, or enjoyment of any other right, waiver of the right to an investigation and adjudication of formal complaints of sexual harassment as outlined in this policy. Additionally, Bethany cannot require the parties to participate in an informal resolution process and cannot offer an informal resolution process unless a formal complaint has been filed.

g) Recordkeeping

Bethany will maintain for a period of seven years the records regarding the following:

- A. Each sexual harassment investigation, including any determination regarding responsibility, the audio recording, audiovisual recording, or transcript of the hearing, any disciplinary sanctions imposed on the respondent, as well as any remedies provided to the complainant designed to restore or preserve equal access to Bethany's education program or activity
- B. Any appeal and the result there from
- C. Any informal resolution and the result therefrom and
- D. All materials used to train Title IX Coordinators, investigators, decision-makers, and informal resolution facilitators. Bethany will make these training materials publicly available on its website.

For each response to a report or formal complaint of sexual harassment, Bethany will create and maintain for a period of seven years, records of any actions, including any supportive measures taken. In each instance, Bethany will document the basis for its conclusion that its response was not deliberately indifferent and document that it has taken measures designed to restore or preserve equal access to Bethany's education program or activity. If Bethany does not provide a complainant with supportive measures, then Bethany will document the reasons why such a response was not clearly unreasonable in light of the circumstances.

These records will be maintained in the personnel files maintained by the President's Office.

Process B: Sexual Misconduct Complaint Resolution Process

The following procedures pertain to alleged incidents of sexual misconduct, as defined in Section III.C. of this policy.

#### 9. i. FILING A SEXUAL MISCONDUCT COMPLAINT

Complainants may file a complaint with the Title IX coordinator to initiate Bethany's sexual misconduct complaint resolution process. If a complainant files a complaint directly with the Title IX Coordinator rather than submitting a report, Bethany will promptly contact the complainant to provide Supportive Measures and additional information as referenced in Section V. of this policy, Reporting Sex Discrimination, Sexual Misconduct & Sexual Harassment.

#### **Who Can File a Complaint?**

The complainant or Title IX Coordinator must file the complaint. The Sexual Misconduct Complaint Form can be accessed on the Bethany website.

Third parties cannot file complaints. Additionally, fundamental fairness and due process principles require that a respondent be informed of the details of the allegations made against them, to the extent that the details are known, to provide an adequate opportunity for the respondent to respond. Therefore, a complainant cannot remain anonymous and file a complaint to initiate the complaint resolution process. However, the Title IX Coordinator will keep confidential the identities of the complainant and respondent (and witnesses) from anyone not involved in the complaint resolution process, except as permitted by FERPA, required by law, or as necessary to conduct the grievance process. For more information about confidentiality, see Section III.D. of this policy.

While a complaint requires the complainant's identity, Bethany does not require a complainant to identify the respondent in a complaint. If a complainant does not know the respondent's identity and files a complaint, Bethany will still investigate the complaint to the best of its ability because an investigation may reveal the respondent's identity. If the respondent's identity becomes known, Bethany will send both parties the written notice of allegations, follow the complaint resolution process outlined in this policy, and may impose disciplinary sanctions against the respondent at the conclusion of the process. However, if a respondent's identity remains unknown, Bethany will be unable to comply with the required grievance process outlined in this policy and therefore unable to impose disciplinary sanctions against the respondent.

Under certain circumstances, the Title IX Coordinator may determine that an investigation is necessary, even when the identity of the complainant is unknown, or if the complainant does not want an investigation. In this case, the Title IX Coordinator may choose to sign a complaint and initiate the complaint resolution process. When this occurs, the Title IX Coordinator is not a complainant or otherwise considered a party included in the grievance process. The alleged victim will remain the complainant and be treated as a party in the complaint resolution process. However, the complainant is not required to participate in the complaint resolution process.

## 10. ii. COMPLAINT RESOLUTION PROCESS

### 1. **Complaint Committee**

Upon receipt of a complaint, the Title IX Coordinator will convene the Bethany Theological Seminary Complaint Committee. Generally, the Complaint Committee in charge of addressing complaints of sexual misconduct consists of the Bethany Theological Seminary President, Academic Dean, and a member of the teaching faculty, so that more than one gender is represented by those involved.

### 2. **Written Notice**

Upon receipt of a complaint, the Title IX Coordinator will provide a written notice of allegations to both parties, if known, simultaneously.

The written notice will include the same information referenced in this policy under Process A: Title IX Formal Complaint & Grievance Process, subsection ii. Grievance Process for Formal Complaints of Sexual Harassment, a) Written Notice, with the exception that the notice will contain information regarding the allegation of sexual misconduct rather than sexual harassment.

### 3. **Investigation of the Complaint**

The Complaint Committee will investigate the complaint and will generally complete the investigation within thirty (30) days.

During the investigation, the burden of proof and the burden of gathering evidence sufficient to reach a determination regarding responsibility rest on Bethany Theological Seminary and not on the parties. Complainants and respondents may decide not to share their side of the story or may decide not to participate in an investigation or hearing. This does not shift the burden of proof away from Bethany and does not indicate responsibility. Additionally, the Complaint Committee will not make an adverse inference against a complainant or respondent based upon the party's refusal to participate in an investigation, nor will the respondent's refusal to participate result in increased sanctions if the respondent is found responsible for the accusations.

Generally, the Complaint Committee will follow the investigation procedures outlined in this policy under Process A: Title IX Formal Complaint & Grievance Process, subsection ii. Grievance Process for Formal Complaints of Sexual Harassment, b) Investigation of Formal Complaints.

The involved parties will also be invited to submit written impact statements to the Complaint Committee, which will be reviewed by the Committee while determining sanctions, if necessary.

### 4. **Formal Resolution of Complaint**

Upon completion of the Investigative Report, the Complaint Committee will convene to review the complaint, Investigative Report, and the parties' written responses to the Investigation Report (if any).

If the Complaint Committee determines that there is sufficient information to find, by a preponderance of the evidence, that a policy violation occurred, the Complaint Committee will consider the imposition of disciplinary sanctions designed to eliminate the misconduct, prevent its recurrence, and remedy its effects, while supporting Bethany's educational mission, and internal policies. Disciplinary sanctions or interventions may also serve to promote safety or deter individuals from similar future behavior.

The Complaint Committee is responsible for determining the appropriate disciplinary sanction(s). The Complaint Committee may also consult with the Title IX Coordinator, Title IX Deputy Coordinator, or designee. In reaching this determination, the Complaint Committee will review and consider the written impact statements provided by the parties.

#### **5. Determination of Responsibility**

Once the Complaint Committee has reviewed relevant information, impact statements, and determined if the respondent is responsible for the alleged sexual misconduct, it will issue a written determination to both parties simultaneously.

The procedures for issuing as well as the information contained in the written determination is outlined in this policy under Process A: Title IX Formal Complaint & Grievance Process, subsection ii. Grievance Process for Formal Complaints of Sexual Harassment, d) Determination of Responsibility. However, the written determination in Process B will identify allegations potentially constituting sexual misconduct, as defined in Section III.C., rather than sexual harassment.

#### **6. Appeals**

Either party may appeal the outcome of the complaint. Bases and procedures for appeal are found in this policy under Process A: Title IX Formal Complaint & Grievance Process, subsection ii. Grievance Process for Formal Complaints of Sexual Harassment, e) Appeals.

Generally, the Appellate Officer is the Chair of the Board of Trustees.

#### **7. Informal Resolution**

At any time following the filing of a complaint and prior to reaching a determination regarding responsibility, Bethany offers complainants and respondents informal resolution options such as mediation, restorative justice, or other forms of alternative dispute resolution, which do not involve or require a full investigation and adjudication (hearing process).

Bethany's procedures for proceeding with Informal Resolution options are outlined in this policy under Process A: Title IX Formal Complaint & Grievance Process, subsection ii. Grievance Process for Formal Complaints of Sexual Harassment, f) Informal Resolutions.

## **Confidential Resources, Medical Services & Counseling Services**

### 11. Confidential Resources

Clergy & Chaplains

Licensed Professional Counselors

Genesis Crisis Center (24 hours)

15 S. 11th Street

Richmond, Indiana 47374

(765) 935-3920 or 800-886-4508

Intimate Partner Violence and Stalking (24 hours)

800-464-8340

Rape Abuse and Incest National Network (RAINN)

1-800-656-HOPE

[www.rainn.org](http://www.rainn.org)

The RAINN hotline offers free, confidential counseling and support 24 hours a day, from anywhere in the country.

National Resource Center on Domestic Violence Hotline (24 hours)

800-799-SAFE

### 12. Other Resources

On-Campus Resources

Earlham College Department of Public Safety (24 hours)

(765) 983-1400

Public safety office on call

Earlham College Health Services Department

(765) 983-1328

Richmond Community Resources

Richmond Police (24 hours)

911 (emergency) or (765) 983-7247

Reid Health (24 hours)

1100 Reid Parkway

Richmond, Indiana 47374

(765) 983-3000

Federal Hate Crimes Reporting Line

1-800-2-JUSTICE

## **Community Governance**

### **Principles**

#### **Communication**

Of utmost importance in this plan of Community Governance is maximizing communication on several levels: between students and faculty; between students and their elected student representatives; between the various components of Community Governance; and between the Bethany and Earlham School of Religion communities.

#### **Accountability**

Maximizing communication in this manner will provide an arena for greater accountability among the levels listed above.

#### **Needs**

Recognizing the unique character of the Bethany community, including spouses, families, local and commuting students, faculty and staff, and the ways in which that character changes from year to year, this plan was developed to meet the needs of a changing, diverse student body.

#### **Gifts**

This plan was also developed to include many people in the process, utilizing their God-given gifts, as well as placing reasonable demands on individuals' time.

#### **Participation**

To fully participate in and utilize the Community Governance model, each person within the community must be actively involved. This may include:

1. Sharing your ideas, concerns, needs, and interests with any representative of the appropriate committee
2. Participating in all elections and calling of leadership
3. Volunteering to serve on a committee or other called/elected representative position
4. Attending all appropriate meetings; and
5. Reading special bulletins, messages sent via listservs, and paying close attention to the Community Governance bulletin board (located in the second floor Study Room).

The Community you are now a member of, and the model of governance that manages it, are yours. How successful they are depends on you.

## **Components of Community Governance and Student Participation**

The following groups and Committees include opportunities for student participation or representation.

### **Board of Trustees**

The Bethany Theological Seminary Board of Trustees is elected or confirmed by the Church of the Brethren Annual Conference. The Board of Trustees has three primary tasks:

1. Develop the mission, goals, and policies of the Seminary
2. Provide for and monitor the necessary financial resources of the Seminary
3. Select and hold accountable leadership chosen to implement the mission of the Seminary.

Faculty and students send representatives to the meetings of the Board of Trustees, held once in the fall and spring of each year. Student representatives are called by the Student Leadership Team and shall include:

1. An appointee to the Academic Affairs Committee of the Board
2. An appointee to the Business Affairs Committee of the Board
3. An appointee to the Institutional Advancement Committee of the Board
4. An appointee to the Student Affairs Committee of the Board.

On the occasion that a student from one of the above committees is unable to attend, the Student Leadership Team or the Director of Student Development will appoint an appropriate replacement.

### **Commencement Events Committee**

This committee plans the events surrounding graduation exercises: the baccalaureate service, senior banquet, and assists in planning the Academic Ceremony.

Commencement is an official service of the Board of Trustees, in cooperation with the President's Office. Plans must be made within budget constraints and work with precedents set in the past. The Board of Trustees, in consultation with the President's Office, appoints the commencement speaker.

Faculty representatives to this committee shall include the President (convener), Director of Marketing and Communications, the Executive Assistant to the President, and the Director of Student Development.

Students from the graduating class are encouraged to share their gifts and talents during commencement events. Students of the graduating class wishing to offer assistance or ideas for the commencement activities should contact the Director of Student Development.



### **Educational Policies and Advisory Committee (EPAC)**

Matters of academic concern are normally referred first to the Educational Policies and Advisory Committee for decision. The committee may in turn refer the matter to the faculty. The Educational Policies and Advisory Committee shall ordinarily consist of the Academic Dean (who convenes the committee and brings the agenda), one or two faculty members, the Joint Seminaries Registrar, and two students (one MDiv student and one MA student).

This Committee:

1. Operates within the framework of FERPA confidentiality standards and laws. Student members of EPAC are asked to recuse themselves voting on their own proposals to the committee.
2. Reviews assessment data, as requested and appropriate.
3. Makes recommendations to faculty concerning changes in the curricular program and academic policies.
4. Makes recommendations to faculty concerning issues brought by students to, or that arise during, this committee's meetings, which require full faculty attention for discussion, adaptation, and/or approval.
5. Receives requests from faculty regarding program, policies, or other issues appropriate for the committee.
6. Receives, responds to, and approves requests from students for independent studies, MA Thesis and Portfolio proposals, course extensions, course withdrawals, and exceptions to prescribed educational procedures or policies.
7. Receives, responds to, and approves drafts of new course descriptions from faculty, bringing those descriptions to faculty for final approval.
8. Assists the academic dean in preparing an annual report for the faculty and board that summarizes the data reviewed by the committee and by the faculty, outlining the changes in program and practice that these data have generated.

### **Faculty Meeting (Bethany and Bethany/ESR)**

Bethany faculty meetings, including teaching and administrative faculty, are held regularly (generally one Monday in August, September, October, November, February, March, April, and May). Four times (twice a session) during the year, the Bethany Faculty meets jointly with Earlham School of Religion faculty to work at important issues of concern to both schools. Meetings of the joint faculty shall include student liaisons from the Earlham School of Religion, and members of the Bethany Student Leadership Team. The faculty convenes to:

1. Offer mutual support and mutual sharing
2. Attend to business for which the entire faculty is responsible
3. Provide oversight for academic programs and
4. Discuss items under consideration by the Committees initiated by Bethany faculty.

The Student Leadership Team shall name one or two of its members as liaison to both the Bethany Faculty Meeting and the Joint Faculty Meeting.

### **Patterns of Worship Class**

The Patterns of Worship Class (M220) works with the Student Chapel Coordinator to function as the Seminary's Worship Committee and is responsible for developing the public worship services of Bethany through regularly scheduled and specially arranged worship gatherings.

It also serves in conjunction with the Joint Worship Committee of Bethany and ESR, seeking to develop joint services of worship that encourage and develop a diversity of worship experiences and draw both seminary communities into meaningful and inspiring worship of God. If there is insufficient enrollment in M220, the responsibilities of coordinating worship will be covered by a designated member of the teaching faculty, the Student Chapel Coordinator, and a group of students appointed by the designated teaching faculty. Otherwise, the Patterns of Worship class will work with the teaching faculty and the Student Chapel Coordinator to complete the following responsibilities:

1. Planning for and implementing regular Wednesday morning worship services in Nicarry Chapel, including:
  - a. Preparing and leading worship
  - b. Working with members of the Student Leadership Team to select a fall preaching theme for worship services that are edifying and challenging to the life of the Seminary community/ties. (Usually, faculty members and guests preach in the fall; senior students and guests preach in the spring)
  - c. Identifying and inviting preachers and worship leaders for each service, securing music leadership for each service; student preachers are required to have taken Introduction to Preaching before they may serve as a preacher in chapel
  - d. Coordinating worship centers and musicians
  - e. Coordinating the efforts of all leaders in each worship service
  - f. Facilitating the careful and deliberate communication of worship guidelines
  - g. Encouraging a spirit of hospitality as we invite all members of the seminary communities to contribute their gifts to corporate worship.

2. Planning for several special worship services during the year as requested by the Bethany community (and in cooperation with the ESR Worship Committee), which might include (but are not limited to) services centered around Thanksgiving, Love Feast, Advent, Christmas, Lent and/or Easter, and other holy days of justice (e.g., World AIDS Day, M. L. King Jr. Day, International Women's Day, International Day of Prayer and Witness for Peace).
3. Publicizing both regularly scheduled and specially scheduled worship events to members of the Bethany and ESR communities in a timely manner.
4. Maintaining a hospitable atmosphere for all visitors and guests who may wish to attend worship.
5. Raising questions and issues concerning the quality and diversity of worship practices experienced in all chapel services.
6. If possible, one representative from the class will meet regularly with the Joint Worship Committee of Bethany and ESR throughout the academic year to coordinate and prepare Thursday joint worship services. A member of the teaching or administrative faculty of Bethany will also serve on the Joint Worship Committee.

Each year a Student Chapel Coordinator (SCC) will be appointed by the teaching faculty who is teaching the Patterns of Worship course and approved by the Academic Dean. Along with the teaching faculty member, the SCC will be responsible for finalizing all worship arrangements, integrating speakers and leaders from outside the Bethany community, and promoting theological integrity and the creative design of meaningful worship events.

### **Student Leadership Team**

As the Bethany community continues to expand and embrace greater diversity and geographical locations, we must pause from time to time to evaluate our systems of leadership. During the 2023-24 school year, the Student Leadership Team will be under evaluation by the Director of Student Development and a committee of student representatives. All students are encouraged to offer their insights on the kind of student support and representation they feel would be most helpful during their student experience. To participate in this evaluation, or to offer your insights, please contact the Director of Student Development.

## **Buildings and Services**

### **Buildings**

#### **Bethany Center**

Bethany Center is located just west of the Earlham School of Religion Center on National Road West in Richmond, IN. The building, completed in August 1994, includes classrooms; offices and workrooms for faculty, administration and support staff; Nicarry Chapel; a resource room for congregational life; and areas for informal gatherings, group meetings and study. To schedule use 25Live; please contact the Dean's Office or President's Office for assistance using 25Live.

**Kitchen, Snack Area** - At the far end of the gathering room on the first floor is a kitchen with a microwave oven, refrigerator, and coffee supplies. Students, faculty, and staff are welcome to use this facility. If you use the kitchen, please be sure to clean up after yourself, as there is no one designated to clean up after each user. Mark your food/drink items with your name. Anything left or without a name may be eaten by others or cleared out at any time.

**Day Lockers** - Lockers are also located in the gathering room. These are for students for short term use. Do not leave food items in lockers. Bethany is not responsible for the security of items in lockers.

**Mailboxes** - Student mailboxes are in the gathering room. Students, who have indicated their mail is to be delivered on campus, will be assigned a box. Mail for faculty and staff is distributed to their boxes near the front desk.

**Telephone** - To reach faculty or staff by phone, call 765-983-1800. A menu of extension numbers is listed on the recording.

#### **Brethren House and the Bethany Neighborhood**

Brethren House serves as a hospitality center and guest house for adjunct faculty, potential students, and other guests of the school. At the time the house was gifted, Women's Fellowship Groups and individual members of area congregations in Ohio and Indiana worked to renovate the house. It has been renovated most recently in the summer of 2015. It is located on the corner of College Avenue and SW "C" Street. The Neighborhood is currently comprised of Brethren House, Carver House, Mullen House, Patterson House, and Richmond House. An additional two houses, Miller House and Davis House, are located a short walk down College Avenue.

See the Bethany website for the reservation form and rates.

#### **ESR Center**

Located on the corner of National Road West and College Avenue, this is the main classroom building for Earlham School of Religion. It houses four classrooms, the Quigg Worship Room, a dining room, a computer lab, a meditation room, a conference room and commuter lounge (with a shower) and telephones for student use. Bethany and ESR students share these facilities. The ESR Center is also the home of the Seminary

Computer Services office. The Joint Seminaries Registrar is located in the ESR Barclay Center, next to the ESR Center.

To schedule meetings in the ESR Center or for additional information, call 765-983-1423.

### **Lilly Library**

Lilly Library serves Bethany Theological Seminary, Earlham School of Religion, and Earlham College. Built in 1962 and expanded in 1992, the Library houses over 407,000 volumes, including a substantial theological collection. The Library also provides access to a wide range of bibliographic databases, online scholarly resources, electronic books, and more than 24,000 periodicals. Connections students and those who live far from Richmond have access to these collections electronically or through Document Delivery. Nationally recognized as a teaching library, the Earlham Libraries were awarded the 2001 Excellence in Academic Libraries award by the Association of College & Research Libraries.

Bethany's holdings incorporated into the Lilly Library include several thousand works related to the Church of the Brethren and its heritage, plus portions of the Ora I. Huston English Bible collection and the library of Abraham H. Cassel. In 2002, the Eberly Hymnal Collection was added.

### **Robert Barclay Center**

Robert Barclay Center is Earlham School of Religion's administration building. All faculty and staff offices for ESR and the Joint Seminaries Registrar, except for Seminary Computer Services, are located there. Office hours are typically 8:00am – 4:30pm, although the building closes during worship services and on weekends. To reach faculty and staff at ESR call 765-983-1423. Individuals can be reached by dialing 983- and the extension number listed for that person, see page 8.

### **Runyan Center**

The student union building of Earlham College, the Runyan Center, houses

- Campus bookstore serving Bethany, ESR and Earlham students
- Post office
- Recreation facilities
- Coffee shop,
- Fine arts center and theater

### **Susquehanna Valley Ministry Center**

Susquehanna Valley Ministry Center (SVMC) is a Church of the Brethren educational partnership of the Atlantic Northeast District, Middle Pennsylvania District, Mid-Atlantic District, Southern Pennsylvania District, Western Pennsylvania District, the Brethren Academy for Ministerial Leadership, and Bethany Theological Seminary. In previous years, Bethany Theological Seminary offered graduate-level courses through SVMC that can be applied to a Master of Divinity degree, Master of Arts degree, or any of Bethany's graduate certificates. Beginning in Spring 2023, these courses through SVMC were

discontinued. The new relationship between Bethany and SVMC focuses on Continuing Education events by Bethany faculty members, hosted and arranged by SVMC.

## **Services**

### **Office Equipment and Services**

Office equipment at Bethany Center is for use of faculty and staff. Computers and printers available for student use are found in the ESR Center student lab. Copy machines available to students, for minimal cost, are located in the Lilly Library, and Runyan Center.

### **Parking**

Bethany Seminary has a dedicated parking lot, located to the west of the Bethany Center, with access from National Road. This lot is open to employees and students, with marked spaces for handicapped persons and visitors. Additional parking for Bethany is provided in the lot southwest of campus. Enter the Earlham College campus by way of the "D" Street entrance. Turn right and the lot will be the first one on the right. If these spaces are filled, additional parking may be available elsewhere on the Earlham College campus. Please be considerate parking on College Avenue so that space will be available for residents of the neighborhood.

During orientation parking permits are available from the Department of Campus Safety and Security. The permit fee is \$40.00 per car per year and must be renewed each year. If you are parked on campus without a parking permit and are ticketed, the fine is \$75.00. If you are parked on campus in a handicap space, without a handicap sticker, the fine is \$100.00 whether or not you have a campus parking permit. If you have a campus parking permit and are ticketed for any other parking offense, you will be ticketed \$10.00 for each offense. Parking permits are not required for parking in Bethany's lot, or on College Avenue.

### **Post Office**

A U.S. Post Office is located on the lower level of the Runyan Center. A full range of postal services is available. This post office does not take checks or credit cards for payment of stamps, mailings, etc.

### **Student Employment**

Assistance is offered in finding employment. The Director of Student Development is available to counsel students on employment options. Postings of employment opportunities will come through student listserv, individual emails and postings in the Student Development Office. For employment options that might also serve as ministry formation placements, contact the faculty member responsible for ministry formation.

For Federal Work-Study positions refer to the Bethany website.

### **Student Housing**

Bethany owns several houses near campus, known as the Bethany Neighborhood, as noted above.

Assistance is offered to students who need to secure housing. The Director of Student Development is available to counsel students on such matters. In addition, the receptionist at RBC has a file listing local housing possibilities and there is an ESR/BTS Housing group on Facebook.

For information about the availability of apartments at Campus Village, (a.k.a. "Brick City)," located just south to southeast of Earlham's back campus, contact Earlham Campus Services.

### **Student Identification Cards**

Student identification cards are issued from the Department of Campus Safety and Security, which is located in the Public Safety building, on the east end of the seminary parking lot. Student I.D. cards are necessary to check books out of Lilly Library and enter the Bethany building and Student Computer Labs in the ESR Center after regular business hours. The first student I.D. Card is issued to you at no cost, any replacement cards will cost \$25.00, which will be charged to your student account. Please make an appointment with the Department of Campus Safety and Security, if you are obtaining your ID at some time other than orientation.

Contact Campus Safety and Security for a link to submit your photo and information online so your ID can be ready for an easy pick up. <http://earlham.edu/public-safety/> In order to use your ID card for Bethany and ESR door entry, please see the Financial Aid and Enrollment Assistant for activation.

### **Transportation**

Bus service, through Roseview Transit, is available throughout Richmond Monday through Friday 6:15 a.m. to 5:45 p.m., under 5 ride free. Call Rose View Transit at 765-983-7227 for schedules and routes.

## **Financial Information**

### **Audit Fees**

Those auditing a course pay an audit fee, as indicated in the catalog and on the Bethany website. Students enrolled for six or more credit hours in a given session may audit an additional Bethany or ESR course without being charged the audit fee. Auditing privileges are subject to the approval of the Academic Dean and the course instructor.

### **Clinical Pastoral Education Fees**

Students wishing to receive academic credit for their participation in a Clinical Pastoral Education program will be charged the regular tuition rates for the number of credits received. Church of the Brethren students may fill out the form on the reverse side of this document to request a grant funded by the General Board Endowment for Bethany Students to cover the costs of the CPE program itself. The form should be directed to the financial aid office. A copy of the acceptance letter to the CPE program should accompany the request for grant funding. Bethany will reimburse the CPE program for educational fees, not to exceed 90% of the Bethany tuition for the related credits for COB students.

### **Fees for Bethany Alumni**

We encourage Bethany alumni to take classes at Bethany for continuing education credits. In order to make this as easy and cost effective as possible some of the fees are waived. For alumni enrolled as occasional students, the application fee is waived. The enrollment deposit is required and applied to the tuition cost. Alumni use the occasional student application form and transcripts are not needed. Alums will pay the occasional student continuation fee annually if they desire to remain on active status.

### **Payment**

All students taking Bethany classes at the Richmond campus, online, or other regional sites make account payments to Bethany as outlined in the Student Account Policy below.

### **Refunds**

For dropping individual courses, an official add/drop request must be completed in Banner Self Service. The tuition refund schedule is found on the Academic Calendar.

### **Student Account Policy**

Receipt of the enrollment deposit activates an individual's student account. Once the account is active, the student holds the responsibility to make payments in a timely manner. In return, the Seminary offers the opportunity for the student to attend classes and activities at the Seminary.

### **Statement Delivery**

The Financial Aid and Enrollment Assistant maintains student accounts. At or near the beginning of each month, all charges and payments for the previous month are posted



to individual student accounts. Account statements are printed by the end of the first week of the month. If the last add or drop date falls within the first week of the month the statement may be delayed a few days. The first account statement of each semester will be distributed in two formats: one copy will be emailed as a PDF file to your Seminary email, another copy will be placed in your campus mailbox or, in the case that you do not have a campus mailbox, sent via US mail. It is the student's responsibility to ensure the Seminary has an updated contact address. All subsequent account statements will only be emailed as a PDF file to your Seminary email account. For the sake of receiving documents in a timely manner, please check your Seminary email account on a regular basis. If you would like all your statements sent via US mail instead of by email, it is your responsibility to notify the Financial Aid and Enrollment Assistant. Similarly, it is your responsibility to notify the Financial Aid and Enrollment Assistant if you have a student mailbox but want your statement delivered via US mail.

### **Payment Due Dates**

The session's initial account balances are due before the first day of classes. Any adjustments made to accounts after the session's initial statements have been received are due the last business day of the month in which they are billed. Students are responsible to pay their account in full even if they are expecting payment from an outside source. If a student is unable to pay their account balance in full within the due date, they must make arrangements with the Financial Aid and Enrollment Assistant for payment, or their account will be considered past due.

### **Payment Arrangements**

Payments are accepted by cash, check, or online using a credit card. Any payment made by credit card will be assessed a service fee of 3.0%. Students who are unable to pay the account in full by the payment deadline may wish to apply for federal loans. Students must be US citizens and enrolled at least half-time (6 credit hours per session) to be eligible for federal loans. Students expecting support from another source may receive an extended payment deadline if they provide a written commitment from the source. Details such as who will be making the payment, when the payment will be made, and the responsible individual's signature should be included in the statement from the source. The Financial Aid and Enrollment Assistant, in consultation with the Executive Director of Finance and Administration, will consider requests on a case-by-case basis.

If a student is unable to pay their account balance by the due date, they may make arrangements with the Financial Aid and Enrollment Assistant to make three equal monthly installment payments to pay their account in full by the end of the session. Students will be required to complete a promissory note with the Seminary, within the initial due date, in order to be allowed this option.

The payment plan is only available to domestic students. International students must pay in full by the deadline or keep a \$1,500 deposit in their student account.

The first payment must be received within the initial due date with the remaining payments due one each in the following two months for the account to be considered current. The account of a student who defaults on their promissory note will be considered past due at that point and subject to the same result as any other past due account. Students who default on their promissory note payment schedule will normally restrict their ability to have this option in the future.

### **Definition of Past Due Accounts**

Student accounts will be considered past due and placed on financial hold under the following circumstances:

- The account balance was not paid by the due date and other payment arrangements were not made.
- The student defaulted on the promissory note payment schedule.
- Any extended deadline was not met.
- International students who have not paid in full by initial due date

### **Results of Past Due Accounts**

- A financial hold will prevent registration. (If a student has already registered for future classes, the registration will be revoked.) In order to remove the financial hold to register or to re-register (in the case of revocation), the account must be paid in full. All appropriate late registration charges will apply.
- A financial hold will prevent participation in graduation events and ceremonies. In order to remove the financial hold, the account must be paid in full by April 30.
- A financial hold will prevent releasing of diplomas and transcripts. In order to remove the financial hold, the account must be paid in full.
- Every month, a finance charge of 1% will be applied to any outstanding account balance. Only students who have signed a promissory note or who have made other arrangements (see Payment Arrangements) with the Coordinator of Student Financial Services will be exempt from this charge.

### **Earlham College Charges**

Students are billed directly by Earlham College for health services provided, for parking tickets, for replacement IDs and by Lilly Library for books returned late or lost. Timely payment of Earlham College statements is required for a student to maintain a clear financial account at Bethany. Past due accounts, with a balance of \$50 or more, result in the financial holds noted above.

### **Collections**

The Financial Aid and Enrollment Assistant will work with the student and/or the Executive Director of Finance and Administration to collect past due accounts. All reasonable payment arrangements will be considered. One of the resources available to Bethany, in their attempts to collect on past due accounts, is the use of a Collection Agency. This is not a resource we wish to use, especially with current students; however, it is an option that will be considered.

## **Financial Aid**

Bethany's financial aid program is designed to assist students who have limited resources to meet their educational expenses. It is Bethany's hope that each student will be able to avoid undue financial pressure, excessive employment or unmanageable indebtedness through the establishment of a workable financial plan. Contact the Financial Aid and Enrollment Assistant for questions not answered in this section.

### **Definition of Financial Aid**

Bethany follows the standard definition of financial aid set by the Association of Theological Schools:

1. Financial need is defined as the difference between the total cost of attending a particular institution and the amount of the resources available to the student.
2. Financial aid consists of grants (which may include scholarships, grant-in-aid, field education grants, and prizes), loans, and employment.
3. A need analysis system is a consistently applied method for determining financial need as the basis for allocating aid.

### **Principles of Financial Aid**

Bethany follows the standard principals of financial aid of Seminaries as a member of the Association of Theological Schools:

1. The total amount of financial aid offered should not exceed the amount of the student's need. (See above "Definition.")
2. The student has the major responsibility for his or her educational and living expenses. The Seminary's aid will augment the student's efforts.
3. Financial aid is not an end unto itself but should be administered in such a way as to affirm financial responsibility and integrity of both student and Seminary.
4. The administration of financial aid should be individual, personal, pastoral, and confidential.

### **Components of Financial Aid**

Bethany's financial aid program has the following major components:

1. A 50% covenant grant program for degree and certificate-seeking students based on their vocational goals
2. A 40% or 50% tuition scholarship program for degree and certificate-seeking students based on student's academic performance
3. A need-based grant program for degree and certificate-seeking students who demonstrate financial need
4. Federal Stafford Loan and Federal Work-Study programs.

### **Application Procedures**

Financial aid interpretive materials and application forms are available and may be completed on the Financial Aid page of the Bethany website. Aid applications from new students will be received at any time during the application process for admission to

Bethany up until the deadline. The application deadline for continuing students is June 15. After the deadline there will be no scholarships or grants issued that academic year. All students in need of financial aid must complete the financial aid application process annually based on an academic year. Students must be in good academic and financial standing to receive aid.

**IMPORTANT DATES** (mark your calendars)

May 15      Church Service Covenant for continuing students  
June 15      FAFSA and Bethany Financial Aid Application for federal funds/need-based aid

No financial aid is assumed without application, nor is it automatic.

**Limitations of Bethany Financial Aid Programs (excluding Federal Loan Programs)**

1. The scholarship and grant will not cover the following, except as noted in item two below: online or on campus audit fees, tuition for a class where a non-credit is received, any late drop tuition charged. Financial aid will be forfeited for classes dropped after the drop deadlines.
2. Degree and certificate students may petition (see appeal process outlined below) for applicable scholarship and/or grant funds to cover tuition of up to six additional credit hours beyond those required for a degree. This may include two additional classes a student is interested in, tuition for two non-credited class or four late drop tuition charges, not to exceed six credit hours.
3. Enrollment in schools other than Bethany will not be funded by the program. Cross-registrations with Earlham School of Religion, and/or other schools with which Bethany has a cross-registration agreement are considered Bethany enrollment and are fully funded by the program.

**Church Service Covenant**

After the base amount has been paid students are eligible to receive a 50% tuition scholarship based on their vocational calling. Examples of vocations that fulfill the Church Service Covenant requirements include:

- Pastor of a congregation (full-time or bi vocational)
- Person serving a congregation in self-supporting ministry
- Administrator or teacher in a theological seminary
- Staff persons with districts, the denomination, and other Annual Conference agencies
- Missionary assigned to pastoral or evangelistic duties
- Chaplain (e.g., chaplaincy in a hospital, hospice, long-term care facility, campus, prison, or industrial setting)
- Person serving in a specialized ministry under the auspices of a congregation or other institutional entity (e.g., youth ministry, Christian education, camp)

administrator, ecumenical ministries, spiritual direction, pastoral counselor, or church planter)

- Ministers retired from their area of service

To receive this scholarship, students must demonstrate appropriate academic progress by crediting courses at a pace to complete their program in the allotted time frame and in the appropriate sequence, including a ministry formation placement consistent with their calling to church service, or the approval of their MA thesis/portfolio project.

### **Academic Excellence Scholarship**

After the base amount has been paid, students who demonstrate academic excellence are eligible to receive a scholarship in the amount of 40%-50% of the remaining tuition cost for incoming students. Returning students will be evaluated for the Academic Excellence Scholarship at the completion of the academic year. The Academic Dean will assess student performance, with particular focus on the final rubrics from all courses. An award in the amount of 50% tuition will be granted depending on the level of the student's academic performance.

### **Funds for International Students**

Bethany has available limited tuition grant funds for students who are not citizens of the United States. International students may apply for a need-based grant of up to 100% of tuition after the base amount is paid, not to exceed the demonstrated need. All course limitations listed above apply.

International students who are legal residents of another country and members of the global Church of the Brethren (EYN, CNI, Church of the Brethren India, Igreja da Irmandade, Igelsia de los Hermanos) in their home country may apply for a full tuition scholarship. Contact the Financial Aid and Enrollment Assistant for more information.

### **Federal Student Loans**

Bethany participates in the Federal Stafford Loan program. Through this program students can secure low interest loans when funds are available. Students must be enrolled at least half time or taking six credit hours per semester to be eligible for student loan funds. If a student receives federal loan funds and withdraws, drops out, is dismissed or takes a leave of absence before completing 60% of the semester these funds must be returned. If a student receives loan funds and falls below half-time status their loan grace period will begin for repayment. Any student wishing to apply for federal student loans must fill out a FAFSA (Free Application for Federal Student Aid) and a separate Bethany application. These forms and more information can be obtained on the Financial Aid page of the Bethany website or from the Financial Aid and Enrollment Assistant.

**Important Note:** When a student first takes out a Federal student loan, Bethany will refer them to a financial coach. The student will work with the financial coach to develop a financial plan tailored to their situation. Successful completion of the financial coaching sessions is required prior to taking out loans in future

terms. Typically, 2-4 sessions with the financial coach are required to complete this work. The Financial Aid and Enrollment Assistant will pair students with coaches.

### **Federal Work-Study Program**

Bethany participates in the Federal Work-Study program, which provides limited employment positions both on and off campus. Students must demonstrate financial need and meet federal eligibility requirements to participate. Students do not need to be at least half time to be eligible for a work study position but must be currently enrolled.

### **Exit Interviews for Students with Federal Loan Funds**

Students who borrow federal funds while a student at Bethany must complete an exit interview at the completion of their studies at Bethany. During the interview the student is reminded of their financial obligation and the school learns of the student's permanent address.

### **Eligibility Requirements and Satisfactory Academic Progress**

To determine eligibility for financial aid, Bethany analyzes the student's financial need, determines levels of access to financial aid, and monitors the student's academic progress.

#### **1. Determination of Need**

Need is measured through the financial aid application process. Each student assumes major responsibility in meeting the costs of his or her theological education through savings and other assets; summer and part-time school year employment; family assistance; grants and scholarships from churches; loans and work opportunities.

#### **2. Guidelines Providing for Levels of Access to Financial Aid**

(Levels include: access to all financial aid programs, or no access to institutional funds, or no access to any form of aid except designated gifts and Stafford loans.)

- a. Any student admitted to Bethany without any conditions placed on his/her admission shall be considered eligible for all financial aid for which he/she meets the requirements.
- b. When a student is admitted to Bethany with conditions (a warning, on probation, as a special student or as a certificate student), the Educational Policies and Advisory Committee shall inform the financial aid officer of these conditions to determine whether it impacts their financial aid.
- c. If there is a change in a student's academic status, the Educational Policies and Advisory Committee shall inform the financial aid office of the level at which he/she is eligible for aid.

#### **3. Satisfactory Academic Progress**

Federal regulations require Bethany Theological Seminary to establish a policy to monitor the academic progress of students who apply for and/or receive financial assistance. A student must be admitted to the Seminary and enrolled in an eligible program (MDiv, MA/MASST/MATW, graduate certificate) to be eligible for financial

assistance. All students, whether receiving aid or not, must meet Bethany Seminary academic standards.

- Successfully complete at least 75% of total attempted coursework
- Graduate students enrolled in the MDiv program must complete their degree in no more than 96 credit hours attempted
- Graduate students enrolled in the MA/MASST/MATW program must complete their degree in no more than 56 credit hours attempted
- Graduate students enrolled in the CATS program must complete their degree in no more than 24 credit hours attempted
- Graduate students enrolled in any other Certificate program must complete their degree in no more than 21 credit hours attempted
- Cannot remain on academic probation for three consecutive semesters without the faculty lifting that status

Attempted coursework includes courses that are repeated or NC'd. Courses dropped on or before the 50% drop deadline, are not counted as attempted courses. Attempted coursework includes all accepted transfer credit hours. Grades of W and NC are not considered successful completion of a course.

What happens if you repeat a course?

All attempts for a course count for completion rate monitoring as well as maximum time frame.

What happens if I fail to meet the SAP requirements?

You will be notified through both your Bethany email account and through US mail. Your financial aid will be suspended until you meet SAP standards or have an appeal approved by the Financial Aid Committee.

What if I have extenuating circumstances?

Inability to attend classes due to lack of financial aid is not an extenuating circumstance.

Students who fail to meet these standards and have mitigating circumstances may appeal to the Financial Aid Committee by contacting the Financial Aid and Enrollment Assistant.

### **Appeals Process**

The Financial Aid Committee will review each appeal within 15 business days of receipt. No deferments of your Bethany Seminary charges will be granted during the review time frame.

If your appeal is approved your progress and compliance with terms of your approval will be monitored. Your course selection, completion and grade performance will be monitored to make sure that you are compliant with your contract on a semester-by-semester basis.

### **Failure to make SAP**

Students who fail to make SAP and who have had an appeal denied can regain eligibility by meeting the criteria established above. A student cannot become eligible simply by being out of school for a set amount of time or by paying for courses out-of-pocket.

A student's academic progress is reviewed by the Financial Aid and Enrollment Assistant.

### **Return of Title IV Funds**

Federal law states how Bethany must handle the disbursement or refund of Title IV funds (federal financial aid) if a student withdraws, drops out, is dismissed or takes a leave of absence before completing 60% of a semester. This policy applies to all federal loan programs available to Bethany students.

If a student leaves Bethany prior to completing 60% of a semester, Title IV fund eligibility is recalculated based on the percent of the semester they completed. The percentage of eligible payment period completed equals the number of days completed up to the withdrawal date divided by the total number of days in the payment period. Any break of five or more days is not considered as part of the days in the period.

The withdrawal date will be considered the date a student officially withdraws, per Bethany withdrawal guidelines. If the resulting percentage is greater than 60%, the student is eligible to receive all possible Title IV funds for the period. This percentage will be considered the amount of earned aid.

If a student was disbursed more funds than were earned, Bethany is required to return a portion of these funds and the student is required to return a portion. The amount of unearned aid to be returned will be determined by multiplying the total amount of aid disbursed by the percentage of time completed, then subtracting this number from the total aid disbursed.

Bethany must return its portion of these funds within 30 days of the student's withdrawal date. Students who owe a repayment of funds must repay these funds before again becoming eligible for future financial aid. Bethany may also reapply charges and fees no longer covered by financial aid and the student becomes responsible for these charges and any other outstanding balance on their student account.

If a student earned more aid than was disbursed to them, Bethany would owe the student a post-withdrawal payment which must be paid within 120 days of the student withdrawal. If these funds include loans the student can choose to decline these funds to avoid incurring further debt. Bethany reserves the right to use some/all post-withdrawal funds for payment of outstanding tuition, fees or other charges.



## **Appeals**

Related to Financial Matters (tuition, fees, accounts and financial aid)

If a student feels the need for an exception to matters regarding tuition and fees, the student account policy and/or financial aid for any reason they may appeal using the following steps:

1. Submit the financial aid appeal form with an explanation of the circumstances and plan to avoid similar situations. The Executive Director of Finance and Administration will initiate a conversation with the student if necessary and follow up with a written response. If the student accepts the response, he/she will indicate by signing and returning a copy of the response, and the matter is resolved.
2. If the student disagrees with the response of the Executive Director of Finance and Administration, he/she may appeal to the Financial Aid Committee in writing, attaching all previous communications on the matter. The Committee will initiate a conversation with the student, if necessary, and make a written response. If the student accepts the response, he/she will indicate by signing and returning a copy of the response, and the matter is resolved.
3. If the student disagrees with the response of the Financial Aid Committee, he/she may appeal to the President in writing, attaching all previous communications on the matter. The President will initiate a conversation with the student if necessary and make a written response. The President's decision shall be final.

## Academic Policies

The Bethany Catalog is the primary source of information on academic policies. The following policies supplement those described in the catalog, often with more detail:

### Academic Credit Hour and Course Workload

Bethany offers courses with academic credit in terms of semester credit hours. The amount of credit hours assigned is determined by a combination of the number of hours per week in class (i.e., “direct faculty instruction”) and the amount of time spent in preparation outside of class by the student.

Bethany offers courses in a variety of formats: weekly (twice-a-week and block), weekend intensives, two-week intensives, online, hybrid, and independent study.

Definition of academic credit hour:

- One unit of academic credit is assigned for each hour of “lecture” (contact with instructor that is content-oriented as “direct faculty instruction”) for 14 to 16 one-hour sessions.
- For each hour of “lecture”, it is expected that an additional 2-3 hours per session would be spent outside of class time in reading, writing, research, and preparation. It is expected that a student would read approximately 500 pages per credit hour [understanding that the difficulty of the reading should be considered in determining what and how much is assigned].
- Therefore, a 3-credit hour course would meet for the equivalent of 14 to 16 three-hour sessions, with 6 to 9 hours per session of outside reading, writing, research, and preparation. Students would read approximately 1500 pages for a 3-credit hour course [understanding that the difficulty of the reading should be considered in determining what and how much is assigned].
- Courses assigned with fewer than 3-credit hours will base “contact” time and workload as the appropriate percentage of a 3-credit hour course. For example, using the standard for a 3-credit course, 1-credit would be 1/3; 1.5-credit would be 1/2; 2-credit would be 2/3.
- These guidelines for offering academic credit are consistent with the credit hour definition found in the Department of Education regulation 34 CFR § 600.2.

In course formats that incorporate or use distance education models (online, hybrid), contact hours are defined according to the same Department of Education standard which notes that academic engagement for a course includes such thing as “submitting an academic assignment; taking an exam; an interactive tutorial, or computer-assisted instruction; attending a study group that was assigned by the institution; contributing on an academic online discussion; and initiating contact with a faculty member to ask a question about the academic subject studies in the course” (34 CFR § 600.2). Courses in these formats will contain assignments (both online and reading) so that a hybrid or online course will be consistent with the workload expected in a course in one of the other formats. This may be done by adjusting student assignments, such as more

reading, more discussion online, more postings, and other means of academic engagement in comparison to courses in other formats.

### **Assignment Deadlines (Joint Policy)**

Assignment deadlines are to be adhered to, unless a request for extension has been made ahead of time to the instructor and permission is given. Normally an assignment turned in late without an extension or an incomplete will receive no credit.

Except for emergencies, extensions for assignments must be requested by email or in writing 24 hours / at least one day before the deadline. Not all requests for extensions will be granted depending on the nature or timing of the assignment.

If a student has an accommodation plan that allows for a greater time to complete assignments, when possible, the deadline for each assignment must be discussed with the instructor at least one week prior to the due date in a regular semester or by the first day of a two-week intensive. Having an accommodation plan does not exempt a student from requesting an incomplete (ESR) or a course extension (Bethany) as described below.

For a regular semester course, no assignment may be extended beyond the end of exam week unless an incomplete or a course extension has been requested and approved.

For a two-week intensive, a weekend intensive, or an independent study, unless an incomplete or a course extension has been requested and approved, no assignment may be extended beyond the deadline for all coursework in that session.

Incomplete forms and course extension forms must be submitted by the deadline posted in the academic calendar.

### **Auditing a Course**

#### **Current Students**

1. Students are to contact the instructor for permission to audit the course, and if permission is granted, request that the instructor send an email to the Joint Seminaries Registrar. The Registrar will then register the student in the course for an audit.
2. The Professor of a course is responsible for establishing the requirements for auditors and must give written approval of an audit to the Joint Seminaries Registrar by email.
3. Students who do not meet these requirements will be administratively withdrawn from the course and, thus, no record of the course will be recorded on the student's transcript.
4. Students who are administratively withdrawn from a course as result of not fulfilling the requirements are still responsible for the audit fees associated with that course.

5. Bethany financial aid does not cover the fees for audited classes for any students whether or not they are administratively withdrawn.

### **Seminary Spouses**

Seminary Spouses may audit one course a semester, if their spouse is not also auditing a course that semester. The only cost to the spouse is the application fee. This is a gift from the seminary to the supportive partners of our students. Please see the Admissions Counselor to apply.

### **Continuing Occasional and Audit Students**

Continuing occasional and audit students renew their status once per year, typically in February. They will receive a notification from the Business Office with a renewal form. This form and the yearly payment are to be returned to Business Office in order to remain on active status.

### **Cancellation of Course Due to Enrollment**

The cancellation of a course is a difficult decision that will always disappoint some constituency of Bethany. In certain circumstances however, it is a decision that the Academic Dean is charged with making in the best interests of the institution. The faculty offers this set of guidelines to assist the Dean in these decisions:

1. We are committed to providing the courses our students need and that we have promised to offer via the course schedule. If a course is seriously under enrolled, the Dean will review the matter weighing our commitment to offer the course and the costs to the institution and to the students. When fewer than four students register for a course taught by a regular member of the Bethany faculty, the Dean will consult with the instructor to determine whether to offer the course with a small number of students.
2. When fewer than four students register for a course taught by an adjunct faculty member, the Dean will determine whether there is likely to be additional registrations from incoming new students or returning students in consultation with Admissions personnel and advisors. The Dean will also determine the long-term impact on students who have included the course as a key component of their graduation plan in consultation with advisors and program directors. A decision to cancel or not cancel will take both considerations into account.
3. The decision to cancel a course will normally be made four weeks ahead of the first day of the term. That decision may be delayed if there is potential for additional enrollment sufficient to meet guideline #2.
4. If a course has been cancelled due to low enrollment but one or more students are still interested in developing an individual or group independent study on the topic, the instructor or the interested students may develop an independent study proposal for review by EPAC. An independent study of this type may carry three semester hours of credit. In comparison with the cancelled course, the independent study would require more initiative from the student(s) and less involvement by the instructor, who would take the role of an advisor.

### **Winter Weather Campus Closure Policy**

Bethany Theological Seminary and Earlham School of Religion jointly adopted the following policy regarding winter weather campus closure.

1. The schools will close campus, cancel or delay classes in accordance with Earlham College closure, cancellations or delays.
2. The schools will also cancel classes in the event of a declared "snow emergency" by the City of Richmond, even if Earlham College classes are not canceled. Classes will remain canceled until the snow emergency is lifted.
3. The schools may cancel classes on other occasions as determined by the Dean of Bethany (or the President or Executive Director of Business Services, if the Dean is not available), and the Dean of ESR or the Dean's designee. No classes will meet during a cancellation. Decisions to cancel classes will be made by 6:30 a.m. Cancellation announcements will be made by phone and email using the Earlham Urgency notification system. It is the responsibility of students, faculty, and staff to keep contact information current in Banner. Notice of the cancellation will also be available by recorded phone message at (765) 983-1423 and (765) 983-1800.
4. On occasions of bad weather when the schools remain open, individual faculty members may choose to cancel their own classes when that is the appropriate decision for their particular classes. Notification of persons involved in these classes will be the responsibility of the faculty member.
5. On occasions of campus closure, individual faculty members may choose to hold classes by video conference with the understanding that IT support will not be available. Notification of persons involved in these classes will be the responsibility of the faculty member. Students, faculty, and staff shall not travel to campus and students who elect not to attend will not be penalized if class is held during a campus closure.
6. Individual faculty members may adjust their course calendars to account for class cancellations due to campus closures. Notification of students will be the responsibility of the faculty member.

### **Certificate at Partner School (Bethany and ESR)**

Students enrolled in a degree program at one school (Bethany or ESR) may earn a certificate at the partner school (Bethany or ESR) without going through the complete application process as a certificate student at the other institution. These students must complete a simple form, to be counted and processed appropriately. During the typical process for graduation, they must complete the Intent to Graduate form in order to be awarded the physical certificate and be recognized during commencement. Students may count the certificate courses toward the degree, as per policy of the school granting the degree. Transcripts will reflect both the degree from the home institution and the certificate from the partner school. The courses that apply to the certificate will be indicated on the transcript. Graduates with a certificate from the partner school will be announced at commencement exercises and included in the printed program. Should students enrolled in a certificate program at one school seek to

enroll in another certificate at the other school, they will need to enroll as a certificate student at the second school, with a simplified process.

### **Change in School of Enrollment**

In the admission of students to Bethany and Earlham School of Religion, care is taken to ensure that students are enrolled in the school whose programs best serves their educational and vocational goals. Church of the Brethren students normally enroll at Bethany, and students from the Religious Society of Friends normally enroll at ESR. Students from other faith traditions may choose one or the other school for a variety of reasons. In each case, the expectation is that students will complete their program of study in the school to which they are admitted.

In exceptional cases, a student enrolled at either Bethany or ESR may determine that a given school's program of study is not meeting their educational and vocational goals and may choose to seek permission to transfer or be admitted as a new student to the partner school. This is a situation of complex ramifications, and the partner schools take the following process very seriously. When this occurs, the process outlined below will be followed:

1. The student utilizes the advising process in his/her school to explore the possibilities for fulfilling their goals and needs within their present program, and for addressing any special issues that may arise. This process includes conversations with the Faculty Advisor, the Academic Dean, and the Director of Student Development.
2. If after this discernment process the student still wishes to pursue the option of enrolling at the partner school, he/she will formally withdraw from the school of original enrollment. In addition, the student must fulfill all financial or other obligations to the school.
3. The student may apply for admission to the partner school after the preceding steps have been taken and must meet all the admission requirements of that school. If requested, the student may authorize the release of their file from the original school of enrollment for review by the admissions committee of the partner school; and
4. As a part of the application process, the student must prepare a written statement outlining the ways in which he or she believes that a program of study at the partner school will better serve their educational and/or vocational goals. Assessment of that statement is part of the admission decision by the partner school.

In the case of a student who has previously enrolled at and withdrawn from one of the schools, and who subsequently seeks admission to the partner school, the application process proceeds as described in (3) and (4) above, and includes consultation with appropriate staff at the school of prior enrollment.

The Academic Deans of the two schools monitor this process and keep each other apprised of developments by admissions staff.

### **Change in Status from Occasional to Degree/Certificate Student**

An occasional student who wishes to enter a degree or certificate program needs to take the following steps:

1. Complete the longer Degree Application;
2. Secure forms from the Admissions Office to be given to 3 references that will provide academic, church, and personal references for admission;
3. Submit to the Admissions Office a 2-3 page typewritten essay describing personal and professional goals; how these relate to one's faith perspective, understandings of the church, and sense of calling or vocation; how a Seminary education at Bethany can help fulfill these goals;
4. Submission of new transcripts is not required provided there have been no changes, degrees earned, etc.; and
5. Campus visits and interviews are required in addition to the written materials listed above.

The Admissions Committee acts on requests for change of status when the steps indicated have been taken and all materials have been received and reviewed.

### **Change of Program for Degree or Certificate Student**

All students wishing to change their program of study, must submit a Change of Program form to the admissions committee, following all the steps outlined on the form.

### **Shared Credit in Two Degrees**

Students who wish complete both the MDiv and one of the MA degrees (MA, MATW, or MASST) through Bethany can count a limited number of credits toward both degrees, as appropriate to the degree requirements, thereby reducing the total time needed to finish the two graduate programs. Accreditation standards permit students to use limited credits in one program toward a second one. Bethany permits a student to use "up to half of the credits of the smaller degree." This means that up to 21 credits, half of the required credits for the MA, (or up to 18 credits, half of the required credits for the MATW or the MASST) may be counted toward the completion of the both the MDiv and one of the MA degrees (MA, MATW, or MASST). Students are encouraged to take coursework toward both degrees simultaneously. Students must have conversations with both the director of student development and the academic dean in order to begin this process of shared credit in two degrees and to plan appropriately. Students who wish to complete a graduate certificate in addition to a degree may choose to count up to two courses from the certificate towards the degree program, as appropriate to the requirements of both programs.

### **Session Lengths and Advising/Registration**

Session One contains two parts: August Intensives and Semester-long courses.

Session Two contains three parts: January Intensives, Semester-long courses, and May Intensives.

Advising days will be concurrent with the registration period. Students should plan to meet with their advisors during these days to assist them in choosing courses and registering. If advisees are not local, advising sessions can be accomplished on the telephone or by email. If a degree or certificate program student fails to register by the end of the registration period designated on the Academic Calendar, they must contact the Director of Student Development regarding a Leave of Absence. Please see Leave of Absence Policy for details.

### **Attendance Policy**

Regular attendance in courses that meet face-to-face and equivalent participation in online activities are essential for successful learning and teaching at Bethany. Students need to be present in class or online, both for their own learning and for the contributions they can make to the learning of others. Consequently, Bethany's policy on attendance places limits on allowable absences, considering the format of the course and (in some cases) to the reasons for an absence.

#### **Weekly, Semiweekly, Two-Week Intensives**

In a course that meets weekly, semiweekly, or as a two-week intensive, students who miss more than 20% of the scheduled face-to-face meetings for any reason will not receive credit.

Instructors may set a more stringent standard for attendance when warranted in a particular course, and absences totaling less than 20% of the total class time may still be a factor in the instructor's evaluation of whether a student has earned credit.

#### **Weekend Intensives**

Weekend intensives feature 3 weekend meetings on the Bethany campus or at off-site locations. It is important that students attend all weekend sessions, especially since absence from an entire weekend would mean missing more than 20% of the face-to-face time.

Students who know by the start of a semester that they will be unable to attend an entire weekend session should plan to take a different course or take the same course when it is offered again. Missing a portion of a weekend session may be acceptable if the absence falls within the 20% limit and the instructor agrees.

In the event of certain unavoidable emergencies, a student who has the support of the instructor may petition EPAC to continue seeking credit in a weekend intensive despite missing one weekend session. Such an arrangement will normally involve additional work to make up for the missed class time and to facilitate equivalent learning. Some examples of unavoidable emergencies include the death of an immediate family member, the student being too ill to attend class, or the student being unable to travel due to hazardous weather. Pastoral emergencies or other demands by the student's congregation or employer are not acceptable reasons for missing a weekend session. Students serving as pastors are expected to arrange with their congregations to have a substitute available in case of an emergency. In addition, students are encouraged to arrange for others to help with family emergencies rather than to miss class.



EPAC will consider the circumstances surrounding a serious family emergency, such as an illness requiring a parent to be with a child. Even if a student receives permission from EPAC to continue in a weekend intensive, having missed a weekend is a major concern that the instructor will consider in assessing whether the student has earned credit for the course. A student who misses two weekends of a weekend intensive for any reason will not receive credit.

### **Online**

Online courses do not require attendance at face-to-face meetings, but regular participation in online discussions becomes the equivalent of classroom attendance. Time spent interacting on Moodle is considered time the student would otherwise be spending in the classroom. One should typically expect to spend at least three hours online each week, in addition to readings and other assignments. In keeping with the above 20% standard, a student who misses more than 20% of the posting deadlines (whether failing to post or posting late) during a semester-long course will not receive credit for the course.

In order to maximize interaction among participants in the course, it is highly preferable that students participate in online discussions according to the schedule set by the instructor. It is essential that students keep up with online postings and other assignments, as this is a vital part of the context for online learning. Typically, late posts are not allowed. However, instructors have the freedom to make explicit exceptions to this, as stated in course syllabi.

### **Hybrids**

Hybrid courses include 1-2 face-to-face sessions (usually on weekends) together with online teaching and learning at other times.

The faculty chooses a hybrid format when face-to-face sessions and online activities are both essential for the kinds of learning sought in the course, and students should plan to participate fully in both. In this format, the same 20% limit on total missed class time and postings applies.

### **Synchronous**

Synchronous participation in courses involves students at a distance connecting into a campus course using live video technology. The use of this technology may be either the scheduled format for a course or implemented during weather emergencies (particularly for intensives), as determined by the Academic Dean and the instructor of the course. In such cases, the same 20% limit on total missed class time applies.

### **Adjustments/Exceptions**

Because the relative weight given to face-to-face and online activities may vary from course to course, the instructor in consultation with the Academic Dean will establish a clear attendance policy for each course, considering the overall 20% limit on face-to-face and online absences. The instructor is free to establish a stricter limit than 20% and to clarify expectations for participation and posting within each course syllabus, as

best fits the pedagogy and structure of a course. As with a weekend intensive, a student who misses one face-to-face weekend due to an unavoidable emergency may petition EPAC to continue seeking credit in the course. Such a petition would require the support of the instructor and a plan to accomplish the objectives of the missed session in another way.

In such cases, it is especially important that the student participate actively in all online portions of the course. If a student becomes ineligible to earn credit for a course because of absence under this policy, the student will be subject to the Late Drop of Courses and Withdrawal Policy in this Handbook. Note: This policy applies to students in Bethany courses. Bethany students enrolled in ESR courses follow the ESR Attendance Policy for those courses.

### **Residency Requirement**

Bethany has a residential requirement for its MDiv program and for the MASST program. See the Bethany catalog for details. The MA and MATW degrees and the certificates have no residential requirement. For a course to count toward the MDiv residential requirement, the professor and the student must be in the same location for the course on Bethany's main campus for the majority (51%) of scheduled class time. For ESR courses only, apart from an instructor's policy regarding illness, a student registered for residential credit may Zoom in at most 3 times (for a weekly block class) and still have it constitute a residential class.

### **Complaint Policy (Academic Course Work)**

On the occasion that a Bethany student has done all the work for a Bethany course in a timely fashion and disagrees with the professor's assessment of that work which has resulted in a non-credit (NC), the following process should be followed: The student must first discuss the issues with the professor, arguing his or her case for credit based on the work they did and the requirements in the syllabus. If the conflict remains after this conversation and the student wishes to appeal further, he or she may appeal to the Academic Dean. The Academic Dean will consult with both the student and the professor about the matter and may request another professor's assessment of the materials before deciding whether credit should be granted. The Dean's decision may be appealed to the President.

On the occasion of any other academic complaint, the student must discuss the issue with the professor. If the concern cannot be resolved in this manner, the Dean can be brought in either to make a decision or to form a panel including the President, Academic Dean, and a third party selected annually by the faculty to hear formal complaints, investigate such complaints and resolve the issue.

### **Complaint Policy (Joint Policy Bethany and ESR)**

On the occasion that a student from either partner Seminary needs an institutional process to appeal formally an action on the part of a professor, he or she shall use the process stated in the policies of the professor's institution (ESR Student Complaint

Policy in the ESR Student Handbook; Bethany Student Complaint Policy, above). A student filing a complaint will be accompanied through the process by his or her advisor/mentor or another faculty member from the student's institution approved by the student.

In the case of jointly taught courses or other circumstances involving professors from both institutions, the Deans shall confer and decide how to proceed."

### **Complaints Regarding Compliance with Accrediting Standards**

In accordance with regulations adopted by the U.S. Department of Education, the Association of Theological Schools (ATS) requires that each member school "shall have a process for responding to complaints raised by students related to areas addressed by ATS accrediting standards and shall maintain a record of such formal student complaints for ATS review." Bethany's process for dealing with such complaints is as follows:

1. Copies of the official ATS document describing ATS accrediting standards are kept in the offices of the Academic Dean and the President. They are available for review by faculty and students at any time.
2. If a student judges that Bethany Theological Seminary is not complying with one or more ATS accrediting standards, he/she is encouraged to consult with the Academic Dean. If the issue is not resolved through clarification, the student may submit a formal written complaint to the Office of the Academic Dean, who shall respond to the complaint in writing. Copies of both the complaint and the response shall be placed in a formal complaint file in the Office of the President.
3. If the student who brought the complaint does not regard the response as adequate, he/she may appeal in writing to the President to review the complaint and response and to ask for an additional response. In reviewing the appeal, the President may choose to consult with related individuals and/or groups, to bring the matter to an appropriate internal governance structure or to the Board of Trustees, or to convene a special committee to explore the matter and report its findings. After the review process, the President shall respond to the appeal in writing. Copies of both the appeal and the response shall be placed in the formal complaint file in the Office of the President.
4. The file of formal student complaints and responses to such complaints shall be open for ATS review at all times.

### **Full time Definition**

Bethany considers registration for 12 credit hours per session a full-time academic load. Students typically accomplish this by taking four semester-long classes per session or three semester-long classes and one two-week intensive in either August, January or May intensive periods. International Students located in the United States must take at least 9 credit hours per session.

## **Independent Study Policy**

- An Independent Study is a curricular option intended to augment regularly offered courses. Independent Studies may be used for several reasons: to pursue a topic of particular interest or importance to the student, to supplement an area or topic not explored within the curriculum, to provide focused research related to the MA/MATW Thesis/Portfolio/Project, and to make the content of regular courses accessible due to schedule conflicts or course availability. The Independent Study Form for the Cross-Cultural Course requirement is handled on a separate form.
- All requests for an Independent Study with a Bethany faculty member must be approved by the Educational Policies and Advisory Committee (EPAC). Bethany students desiring an Independent Study from ESR must follow the ESR Independent Study policy. ESR students desiring an Independent Study from Bethany must follow the Bethany Independent Study policy. The academic dean of ESR will be consulted by the academic dean of Bethany when such a request is made by any ESR student.
- Bethany students are eligible to undertake an Independent Study if they are enrolled in a degree program (MDiv and MA/MASST/MATW) after they have completed at least 12 semester hours of regular coursework, and if they have demonstrated ability to do independent research and writing.
- An Independent Study will not duplicate courses offered during a given year at Bethany or ESR, except in the case of students whose schedule and/or location makes it impossible to take advantage of such regularly offered courses.
- EPAC will track the frequency and topics of all Independent Studies with Bethany faculty members.
- Bethany degree students may register for up to 6 credit hours from Independent Studies in one academic year. The total number of credits gained for a degree program through Independent Study must be no more than approximately 15% of total degree credits (6 credits for MA, MASST, and MATW; 12 credits for MDiv). Certificate students may take up to 3 credits (one course) as an independent study. Occasional Students may not register for Independent Studies.
- Bethany students may register for an Independent Study through Bethany for variable credit hours: 1.0, 1.5, 2.0, 3.0. The expected work will be appropriate to the number of credits.
- Appropriate reading for an Independent Study of 3 credits will normally consist of approximately 1500 pages. A lesser number of pages may be appropriate when the course includes some structured learning experience as well as reading.
- An Independent Study will typically include reading, a written project or other product that demonstrates the student's learning, and scheduled meetings with the faculty instructor/supervisor.
- Independent Studies may be structured either as a course by an individual student or as a group of students involving peer interaction. If a group of students wishes to do an Independent Study together, each student will submit a coordinated proposal and register separately, and the dean will discuss the group proposal with the intended faculty instructor/supervisor, especially in terms of teaching load.
- A faculty instructor/supervisor supported by the dean and approved by EPAC will oversee an Independent Study. The instructor/supervisor may be either a regular member of the faculty or another qualified person approved by the Dean to serve in

that role. In the latter case, a regular member of the faculty will be designated as the contact person for the outside instructor/supervisor.

- Bethany faculty members carrying a regular teaching load may serve as instructor/supervisor for up to two Independent Studies (typically 6 credits total) each term. Exceptions will be negotiated with the dean.
- Students will submit a proposal on the form found on the back of this sheet, including all required information, attachments, and signatures, to the dean who brings the request to EPAC.
- The proposal must be approved by EPAC prior to the student beginning the work outlined in the proposal.

### **Course Extension Policy**

- Students may not submit papers, examinations, or other required assignments as a part of course work after the final day of the term, as indicated by the date specified on the Academic Calendar.
- Bethany does not grant “incompletes.” However, students may request an extension by completing the “Course Extension Form” on the reverse side of this sheet, including all the required information, the reason for the request, and the signature of the instructor for the relevant course.
- This form will be submitted to the dean and must be received by the final day of the term, according to the Academic Calendar. All extension requests must be signed by the appropriate instructor, at the discretion of the instructor for the course.
- Extensions will only be given because of extenuating circumstances. Extenuating circumstances are those that could not have been prevented or anticipated and were completely out of the student’s control, such as serious illness, death in the family, or other such emergency.
- Students may apply for one of two types of extensions:
  1. Extensions may be granted for one additional week after the final day of the term. The following signatures are necessary for approval: the instructor and the dean.
  2. Students may request a longer extension to complete coursework, typically two weeks but will not exceed four weeks, by submitting the Course Extension Form, appropriately completed and signed, to the dean, who brings the request for additional time to the Educational Policy and Advisory Committee (EPAC) for possible approval.
- Students may submit only one extension request per course: either the first option of one week or the second option for a longer period, as listed above, but not both. Students may not request an additional extension.
- Failure to complete the required work within the extension deadline will result in a “no-credit” (NC) for the course.
- The dean will inform the student’s advisor of the request for extension by the student.
- The dean will inform the student of the result of any extension request. The dean will also inform the Joint Seminaries Registrar of any approved extension request. The dean will inform Student Services, if the extension date goes beyond the end of the grading period.

- A pattern of requests for course extensions by the same student is a serious educational concern. In such cases, extensions may not be considered. EPAC will maintain records of all extension requests, especially to identify such patterns.
- If a student wishes to appeal the decision for an extension, the student will follow the Complaint Policy, as outlined in the Student Handbook.
- Students follow the policy of the school (Bethany or ESR) in which they are enrolled, regardless of which school offers the course for which they are seeking an extension.

### **Course Load/Overload Policy**

A course load of 12 credit hours per semester is considered a full-time course load for each session. Any additional credits are considered an overload.

Permission to take a course overload of an additional 1-3 hours in a given session may be granted by the faculty advisor as an exception to normal policy if ALL of the following criteria are met:

1. The student is in good standing academically, and has successfully credited all of the courses for which he or she was enrolled in the most recently completed session
2. The student is carrying no more than 20 hours of employment and/or volunteer assignments per week during the session in which the overload will be carried. The total of 20 hours includes Federal Work-Study and, for MDiv students in a ministry formation placement, hours committed to their field education assignment as ministers in training
3. The student has not requested course extensions during the session most recently completed and does not anticipate requesting such an extension during the current session. If the student subsequently requests a course extension for a course taken during the current session, that will nullify the permission granted for an overload in the upcoming session; and
4. The faculty advisor deems that the student can carry the overload without jeopardizing health and/or the quality of the student's work.

A course overload is not permitted during the student's first year of study.

Students desiring to register for an overload need to obtain a form from the Academic Services website or workroom and give the completed form to their faculty advisor. The signed form will be submitted with the course registration form to the Academic Services office.

Students denied permission to take an overload may appeal the decision of their advisor to the Academic Dean. The Academic Dean's decision is final.

### **Course Load for Two-Week Intensives**

The seminars do not permit a student to be enrolled in two two-week Intensive courses concurrently. The concentration of material and the amount of time for critical reflection during a two-week Intensive require the full attention of the student.

It is possible, though not recommended, for a student to audit one two-week Intensive while taking another for credit concurrently. In this case, the student will seek the permission of the professor whose course will be audited, following the policy for audits, and will also inform both professors and the student's advisor.

### **New Student Registration**

Orientation is required for all degree and certificate students. New Students will have the opportunity to register with their advisor and Joint Seminars Registrar prior to orientation. The registration deadline for new students is posted on the Academic Calendar. Anyone who fails to meet this deadline will be subject to late fees. All registration activity is done in close consultation with your academic advisor. During orientation, students will meet with his/her academic advisor. New students will be given access to the Orientation Moodle Site for paperwork, student handbook, surveys and other informative pieces. They are expected to read through everything and provide completed paperwork at orientation.

### **Late Registration**

A late registration fee will be charged when initial registration (not drop/add activity) for a session is not completed until after the registration period has ended. This late fee will also be charged for students who have a financial hold on their account, which prevents their registration until after the registration period has ended.

If arrangements have been made by a student to meet their financial obligation by the beginning of the new session, the financial hold will be removed to allow registration. If the student does not meet their financial obligation as agreed, their registration will be revoked, and they will be unable to begin classes. (See Student Account Policy above). Courses may be dropped and added between the registration period and the add/drop deadlines found on the Academic Calendar. This is accomplished through Banner Self-Service. The Academic Calendar and instructions for the use of Banner Self-Service can be found on the Academic Services Moodle site.

### **Registration Waiting Lists**

1. Courses with enrollment limits: Each course with a limit will be filled on a first come, first serve basis by students who need the course for their program or emphasis. All other students will be placed on a waiting list in the order that their registration materials are received.
2. The waiting list will be evaluated, and any open spots offered to those students on the waiting list beginning eight weeks before the course begins and will continue until the course is full.

3. These offers will be made by email to the seminary email account of the students. If the student declines the seat or does not respond, the next student on the waiting list will be contacted each day.

### **Registration for CPE and other external programs**

Clinical Pastoral Education (CPE), or other external programs should be registered for in the session in which it will be COMPLETED. Please note the different course numbers and instructors for ESR & Bethany students to take CPE.

### **Cross Registration with Other Seminaries**

Anabaptist Mennonite Biblical Seminary, Christian Theological Seminary, Payne Theological Seminary, United Theological Seminary

Students of Bethany and ESR can take courses at Anabaptist Mennonite Biblical Seminary (Elkhart, Indiana), Christian Theological Seminary (Indianapolis), Payne Theological Seminary (Wilberforce, Ohio) and United Theological Seminary (Trotwood, Ohio) through cross registration.

Fill out a cross registration form, found on the rack in the 2nd floor workroom or on the Joint Seminaries Registrar website, and submit it to the registrar. We will be happy to assist you in any way to make this process smooth. Your tuition will be charged through your own Seminary and your registration and grades will be issued through Academic Services. We will work with the registrar's offices of the Seminary offering the course to accomplish this.

**NOTE:** Do not assume that a course taken at another Seminary/institution can be used to meet a degree requirement. Check with the Academic Dean of your school BEFORE you take the course. There are some courses that cannot be taken at another school.

### **Earlham College Courses**

Students may cross register at Earlham College for graduate level credit in upper-level college courses that pertain to the student's degree program. Frequent examples are languages, philosophy, religion, psychology, sociology/anthropology, music, and management courses.

Students may be asked to do additional work in order to receive graduate level credit.

Procedure to register:

1. Get a "petition to register at Earlham College" form from the workroom
2. Fill it out entirely and get the necessary signatures
3. Attach the form to your registration or drop/add form and
4. Turn it in to Academic Services.



### **Deadlines for Submission of Coursework, Special Requests, Grades, Evaluations**

The catalog describes the policies governing due dates for submitting various materials related to the curricular program. The academic calendar printed in the catalog and updated on the Academic Services website includes specific due dates for some of these items.

### **Change to a Newer Version of the Degree or Certificate Requirements**

When the faculty revises the curriculum, students can request to be held to the newer requirements rather than the requirements under which they began their program. Students will be held accountable to all the requirements of the new curriculum, in such cases. This should be done by filling out the appropriate form with signatures after consultation with their advisor and the Academic Dean.

### **Delayed Completion of Degree Program**

MDiv students have eight calendar years from the date of admission to complete their degree program under the graduation requirements in force when they were admitted. MA students have five calendar years from the date of admission to complete their degree program, including the thesis or portfolio, under the graduation requirements in force when they were admitted. If a degree program is not completed within the time indicated, a student may apply for readmission to the program in order to complete the degree. Upon readmission, a student is advised of new and/or outstanding graduation requirements, and of what courses previously completed will carry forward for credit.

When more than ten years have elapsed from the date of admission to a program, students applying for readmission must complete the usual application process required of new students, including a campus visit and interview, and may request that coursework previously completed receive credit in the new program of study. Such requests to have coursework beyond ten years count toward a program will be brought by the Academic Dean to EPAC for consideration.

Such students must complete a minimum of 24 additional credit hours, which is the equivalent of one additional year of full-time study. In addition, such students need to fulfill all of the degree requirements in effect at the time of readmission. They will be given a preliminary projection of credits to be granted and of requirements to be completed at the time of readmission. At the discretion of either the faculty advisor or the Academic Dean, they may be required to retake some courses taken previously and/or to demonstrate competency in particular areas of the curriculum.

### **Probation and Dismissal Policy**

Any student earning a second NC (no-credit) in their career at Bethany will automatically be placed on academic probation. Probation will be lifted after:

- Initiated by the student in consultation with their advisor and the Director of Student Development, the student analyzes what happened and makes a plan to

prevent further NCs. The written plan is presented by the Director of Student Development to faculty during faculty meeting.

- 9 consecutive credit hours have been completed with no further NCs (or, the number of credits needed to graduate, if less than 9) and the student has fulfilled the stipulations of the approved plan.

If another NC is earned while on probation (3 total), the student will be dismissed. If another NC is earned after probation is lifted (3 total), it will automatically result in probation again. Probation will be lifted after the above requirements have been completed. Another NC (4 total) will result in dismissal.

Any student who earns more than two NCs in the same session will follow the policy stated above, adjusting the total numbers of NCs up by one in each instance accordingly (that is, allowing for 4 instead of 3 and 5 instead of 4, respectively).

A student may appeal the action to dismiss by following the Complaint Policy (Academic Course Work) as outlined in the Student Handbook.

### **Provisional Admission Policy**

Applicants with deficiencies in their previous academic record or application materials may be admitted on a provisional basis. Such students will consult their advisor at the beginning of their coursework to review these concerns. The student will create a written plan to address them. The written plan will be presented by the advisor to faculty in executive session.

Provisional admission status will be lifted when the student has successfully completed 9 consecutive credit hours and the student has fulfilled the stipulations of the approved plan. The Academic Probation Policy will be followed if the student earns more than one NC while on provisional admission.

### **Late Drop of Courses and Withdrawal Policy**

During the weeks between the first drop deadline and the final one, as listed on the Academic Calendar (which is also included as a timeline in this Handbook), a student may simply use Banner Self-Service to drop a course. In this case, a W (Withdrawal) will not appear on the transcript, as the course will not appear. When a student drops a course at any point during this drop period, the student will also notify the professor and Academic Services ([vanloap@earlham.edu](mailto:vanloap@earlham.edu)) via email of the decision to drop, so that a written record can be retained.

If an individual course is dropped after the date designated on the Academic Calendar for not receiving a NC, then this will result in a non-credit on one's academic transcript. Under extenuating circumstances, a student may appeal with a petition explaining the circumstances to EPAC (Educational Policies and Advisory Committee). First, the student will need to have a conversation with the professor. Second, the student will obtain written confirmation of the professor's approval.

Third, the student will send this request via email to EPAC, including the written confirmation from the professor. If approved by EPAC, a W (withdrawal) will appear on the transcript.

Departure from school prior to the final class meeting of the session including final exams is permitted only in an emergency and only with the approval of EPAC in advance of departure. If the student does not appeal to EPAC for a W, then a NC will automatically result.

A Withdrawal (W) will only be granted on a transcript on the basis of extenuating circumstances. Examples of extenuating circumstances include: serious illness, death in the family, or other such emergency that was out of the student's control. Students who wish to request a Withdrawal (W) may do so only between the final drop deadline on the Academic Calendar and an absolute deadline that is four weeks prior to the end of exam week. A request for a W in the last four weeks of the semester will not be granted by EPAC. Instead, during these last four weeks of the semester, the student may appeal to EPAC for a course extension, following the Course Extension Policy. If the student is unable to fulfill the stipulations of the Course Extension, then a NC will result, without the possibility of changing this to a W. This policy does not apply to Two-Week Intensives. For these intensives, see the dates on the Academic Calendar.

### **Leave of Absence Policy**

In order to continue in active status, students in a degree or certificate program must register for at least one course each session. If they are unable to take courses during a given session they must consult with their advisor and communicate with the Director of Student Development for a leave of absence. Students may take a leave of absence for no more than two consecutive semesters at one time. However, students wishing to go on leave of absence must apply each semester in which they wish to be on leave. Leave of absence will not be granted retroactively during a term; the leave would start at the beginning of the following semester.

Leave of absence status may be granted for professional or personal reasons including, but not limited to, illness, caring for an ill family member, birth or adoption of a child, need to deal with changes or crises at workplace, or to study at another seminary and earn course credit that may be transferred into their Bethany program. It should be noted that leave of absence status does not extend the deadline for degree completion.

Leave of absence status includes the following arrangements, privileges, and fees:

1. library privileges continue,
2. student mailbox remains active, if applicable
3. student email account remains active
4. student remains on student email listserv & thus receives newsletters and other communication
5. federal student loans not available for LOA period

6. federal student loan repayment grace period will begin six months after the start of a LOA. Loan repayment would then begin after the six-month grace period ends, twelve months after going on LOA.
7. Bethany wellness center membership subsidy not available
8. cross cultural bank payments will be suspended during LOA period
9. all Financial Aid deadlines must be met prior to the LOA period, in case the student wishes to return to coursework. There is no exception made for late Financial Aid materials. The Financial Aid process for the year after a LOA must be attended to by the normal deadlines. Please be well advised with the following information: [bethanyseminary.edu/admissions/financial-aid/](http://bethanyseminary.edu/admissions/financial-aid/) or contact the Coordinator of Student Financial Services
10. all fees, academic calendar deadlines and routine seminary processes apply during the LOA period

If a student does not register, does not request a leave of absence, and does not withdraw he or she will be administratively withdrawn after the 1st week of semester long courses is completed during the third session in which they have not registered, requested a LOA, or withdrawn. This date marks the end of the period which courses may be added. All student privileges will end at this time. The six-month grace period on federal student loans would then begin and repayment start after the grace period ends.

### **Graduation Policy**

Students must have completed all the requirements of their degree program in order to participate in commencement. However, students who will have completed all their program requirements by the end of the May Intensive immediately following commencement may appeal to EPAC before its November meeting for an exception to this policy, which will be considered on a case-by-case basis. In addition, students must have cleared their student account prior to graduation in order to participate in commencement activities. See Results of Past Due Accounts on page 55 for more detail on student account status for graduation.

Potential graduates should check the academic calendar and academic services forms page for the following:

- Transcript conversion date
- Intention to graduate form and due date
- Graduation fee

Graduation and Commencement Events Information: Additional

Commencement Events include Baccalaureate, the Senior Banquet, and the Academic Ceremony (a ticketed event). Graduates plan the Senior Banquet and Baccalaureate, and the Executive Committee of the Board of Trustees along with the Closing Events Oversight Committee plan the Academic Ceremony.

Graduates are all required to complete the following before they are allowed to obtain tickets for the Academic Ceremony:

- Bethany new alumni exit and alumni interviews, Bethany online exit interview, with follow up face-to-face interview with Director of Student Development.
- ATS Graduating Student Questionnaire, online
- Federal Student Loan exit interview (government requirement for all who have taken any student loans to fund their seminary education). See Financial Aid and Enrollment Assistant for information.

Potential graduates will be invited to be on the planning committees for the senior banquet and the Baccalaureate. The senior banquet takes place the evening before the academic ceremony and is a time to recognize and reflect on the impact each graduate has had on the seminary, in addition to a lovely meal for graduates + 1 guest, staff and faculty. The Baccalaureate takes place prior to the senior banquet, that sends the graduates onward with God's blessing. The Director of Student Development oversees these planning committees, as well as the rest of the exit interview process.

## **Citation Style and Plagiarism Policy (Joint Policy)**

### **Citation policy**

The standard citation style can be found in the most recent edition of Kate Turabian's *A Manual for Writers of Term Papers, Theses, and Dissertations: Chicago Guides to Writing, Editing, and Publishing* (Chicago: University of Chicago Press). Instructors have the option of specifying a different style, and they will state the required style on each course syllabus. Faculty may require students to rewrite an assignment that fails to conform to the specified style.

### **Plagiarism policy**

Integrity is central to life in community. In the academic community, integrity means giving proper credit to people for the ideas and information we receive from them. It also means that the work we submit and represent as our own is really work we ourselves have done.

Plagiarism is using the work of other people without giving them credit, whether in written assignments or formal oral presentations. A glaring example of plagiarism would be submitting an entire essay written by someone else and claiming it was your own. It is also plagiarism to use, without giving credit, someone else's ideas or phrases. This definition applies to words and images, to manuscripts, and to ideas gleaned from spoken communication.

For further examples and appropriate ways to cite, please see the most recent edition of Kate Turabian's *A Manual for Writers of Term Papers, Theses, and Dissertations: Chicago Guides to Writing, Editing, and Publishing* (Chicago: University of Chicago Press), especially sections 4.2.3, 7.9, and 25.1.

The consequences for plagiarism will vary according to the extent of the offense, but even "minor" instances are considered serious enough to incur penalties. These may

range from rewriting the assignment, non-crediting the assignment, or non-crediting the course, up to dismissal from the program.

Any instances of plagiarism will be reported by the instructor to the student, the student's advisor, the academic dean of the instructor's institution, and the dean of the student's institution, if appropriate. Students who wish to challenge the charge of plagiarism have recourse to the Complaint Policy of the instructor's institution.

Students sometimes ask whether they can submit in one course the work they have done for a prior course. The general answer is no, though it is always good to speak with the instructor about this issue. For example, students writing an MA thesis or portfolio are actually encouraged to draw upon and refine prior coursework.

### **Policy Statement on Student Records Student Files and Education Records**

The Seminary complies with all provisions of the Family Educational Rights and Privacy Act (FERPA) as amended. This law includes, among other items, the following provisions.

A student in attendance at an educational institution may inspect and review his/her educational records within 45 days of the time a request to inspect the records is made.

An educational institution shall obtain the written consent of a student before disclosing personally identifiable information from the educational records of a student, other than directory information. The written consent must be signed and dated by the student and shall include:

1. A specification of the records to be disclosed,
2. The purpose or purposes of the disclosure, and
3. The party, or class of parties, to whom the disclosure may be made.

The school shall, upon request, provide a copy of the record that is disclosed to the student.

Prior consent for disclosure of personally identifiable information from the educational records of a student is not required if the disclosure is to other school officials, including teachers within the institution.

An educational agency or institution shall, for each request for and each disclosure of personally identifiable information from the educational records of a student, maintain a record kept with the education records of the student which indicates:

1. The parties who have requested or obtained personally identifiable information from the education records of the student, and
2. The legitimate interests these parties had in requesting or obtaining the information. The student may inspect the record of disclosures.
3. Directory information may be disclosed without consent of a student. This includes the student's name, address, telephone number, date and place of birth, age, gender, race, religious affiliation, major field of study, participation in officially recognized activities and sports, dates of attendance, degrees and awards received, the most recent previous educational agency or institution attended by the student, and other similar information.

A student may refuse to permit the disclosure of any or all of the directory information by informing the institution in writing that such personally identifiable information is not to be designated as directory information with respect to that student.

A written request directing the institution to withhold such information must be made to the Joint Seminaries Registrar within two weeks after the beginning of any session.

#### **Inactive Student Records**

All Student Academic Records are managed by the Academic Services Office. Oversight is the responsibility of the Joint Seminaries Registrar.

1. Inactive files with an admission date of 50 years or less will be scanned and stored on the secure computer drive maintained by Academic Services. Physical files will be stored in locked, fireproof file cabinets in the Archive Room, located in the lower level of the Bethany Theological Seminary building.
2. Inactive student Academic Records with an admission date earlier than the most recent 50 years will be scanned and stored on the secure computer drive maintained by Academic Services. The physical files will be stored at the Brethren Historical Library and Archives, located in Elgin, Illinois. An agreement between the Brethren Historical Library and Archives and Bethany Theological Seminary is on file in the office of the President of Bethany Theological Seminary.

#### **Testing Out of Introductory Courses**

Students may wish to take proficiency examinations in order to satisfy requirements for introductory courses in Biblical, Historical, and Theological Studies. The faculty member teaching the course administers these exams. In the case where two professors both teach the course, the professors will come to agreement on which one will administer the examination in any given session. Note that the number of credit hours necessary for the degree program does not decrease, the student simply has additional electives.

## **System of Student Evaluation**

Course work is evaluated on a credit/non-credit basis. In addition, beginning in fall 2014, faculty prepare final course rubrics assessing the performance of student work in relation to program objectives and other criteria, which become part of a cumulative file during the student's program of study. Prior to graduation, students are given several options regarding the final disposition of this file.

Bethany faculty will include one of four evaluation categories on student final course rubrics, in order to help with student assessment and progress: credit with distinction, credit, credit with concern, and non-credit. Transcripts will continue to reflect only credit/non-credit.

At the conclusion of the student's program of study, the faculty assesses her or his academic file and coursework. If the faculty determines that a degree student's work in a given curricular area is of a superior quality which merits graduation "with honors," that achievement will be so noted on the student's permanent transcript and named at commencement. MA theses and portfolios and MATW projects of exceptional quality may also be affirmed as achieving "with distinction."

## **Transcript**

To order an official transcript, please fill out the transcript request form found on the Academic Services Moodle site. The fee for transcripts is \$7 each after the very first one, which is free.

## **Transfer Credit**

Credit for coursework done at other institutions presumes that:

1. The institution is accredited by ATS and/or a recognized regional accrediting agency
2. The coursework is done at the graduate level
3. The coursework received a letter grade of B- or higher
4. The coursework was completed no more than ten years prior
5. The coursework contributes to the curricular program the student is pursuing at Bethany.

MDiv students may transfer up to 36 credits of coursework taken at another institution, MA students may transfer up to 21 credits of coursework, and MASST/MATW students may transfer up to 18 credits of coursework. All transfer credits must be approved by the Academic Dean. Any exceptions to the above transfer credit policies will be brought by the Academic Dean to EPAC for consideration.

Transfer credit is generally restricted to courses in one or another of the curricular areas described in the Bethany catalog. At the discretion of the Academic Dean, up to nine



credit hours of transfer credit may be granted for courses in cognate disciplines that contribute to the fulfillment of the objectives for the degree program. When such courses receive credit, they will count as electives.

### **Withdrawal From the Institution**

Before withdrawal from the institution is official, a student must speak to his/her advisor, schedule an interview with and file the withdrawal form with the Director of Student Development. The Director of Student Development will inform the Joint Seminaries Registrar and the Academic Dean of the student's withdrawal.

### **Transcript Conversion (Joint Policy)**

Bethany and ESR base their evaluation system on a style of adult learning that is self-directed and growth-oriented. With this goal in mind, credit/non-credit notations and written narrative evaluations are seen to be more appropriate ways of evaluating than standardized grades.

Because this is a non-traditional form of evaluation, some schools and employers have difficulty interpreting a student's final transcript and request a more standardized transcript of grades. In these rare instances, Bethany and ESR agree to allow students in their final year to apply for letter grade conversion, subject to the conditions and procedures outlined below:

1. That the conversion is intended to facilitate further graduate study in circumstances where an application will be aided by a graded transcript, or alternatively when students believe that a graded transcript will aid their potential employment opportunities, but in no other circumstances
2. That ESR offerings of Field Education, CPE and 100 - 200 level spirituality courses and Bethany offerings of F 301 Ministry Formation, F 300 Ministry Elective, and F 502 MDiv Review shall not be converted to letter grades
3. That Faculty will use the narrative evaluations of student course work as a basis for assigning grades
4. That if a course instructor is unavailable due to retirement, relocation, death or other circumstances, then another faculty member will assign a grade based upon the narrative evaluation of student course work written by the original instructor
5. That this is a one-time event activated by a written request to the Joint Seminaries Registrar, which may be made at the commencement of the student's final year. To have their transcripts converted into letter grades, students must submit a written request prior to the end of registration in October
6. That once a transcript is converted into letter grades, it will never be converted back into credit/no credit notations; and
7. That under no circumstances will a transcript be converted into letter grades after a student has ended his or her study at the school through graduation, withdrawal, or expulsion.

## **Confidentiality Statement Regarding Student Files**

### **Individual Student Access**

The student has access to these file contents:

- Application for Admission
- College transcript
- Bethany transcript
- Letters of reference for admission which were not waived
- Student/institutional correspondence concerning admission information
- Academic correspondence during sessions here regarding requests, action, and examination information
- Course materials including demonstration of proficiency material
- Course evaluations.

Ministry Formation and other students have access to the material named above with the individual student's permission. The materials may be obtained with the assistance of the appropriate custodian of the material.

### **President/Academic Dean Access**

The President and the Academic Dean have access to all materials including the above-mentioned materials in the Student Access Section and the waived letters of reference, notes of pastoral concerns, and notes of medical or psychiatric nature.

### **Faculty/Staff/EPAC/Joint Seminaries Registrar**

Faculty, Staff, EPAC Committee, and the Joint Seminaries Registrar have access to all student files. They have access to President/Academic Dean access files only after authorization by the Academic Dean or the President. Under the overall supervision of the President or the Academic Dean, the Executive Assistant to the President and the Administrative Assistant to the Academic Dean have access to these materials as related to the performance of their duties.

### **Persons Outside of the Institution**

Persons outside of the institution (including credit checks, other academic institutions, employment references, or denominational inquiries) have limited access and only to specifically requested signed released documents authorized by the student.

### **Individual Faculty and Staff Files**

Individual Faculty and Staff files on a student are the sole property of the individual faculty/staff. Access to these materials by the student and institutional personnel is only through negotiation with the individual faculty/staff member. Such files may include notes of pastoral concern, progress or evaluations, or letters of recommendation. Letters of recommendation written for a student by a faculty/staff member are kept in the file of the writer and never to be included in the student's file elsewhere.

### **Disposition of Material**

After a student graduates (or a 7-year period has passed since a person terminated with the institution), file contents will be destroyed except for three areas:

1. Permanent record materials consisting of application for admission, college transcript, Bethany transcript, and such other institutional correspondence related to a student's course of study as is deemed necessary by the Academic Dean. The final disposition of these materials is the archives vault in alphabetical order. Access to these materials is limited to the President or the Academic Dean or the Joint Seminaries Registrar (or a representative thereof) and the individual student.
2. Research materials consisting of Graduate Record Examinations, Readiness for Ministry, and personality and other similar tests or evaluations, are kept and separated by year in the archives vault. Access is by permission of the President or the Academic Dean to bona fide researchers who will maintain the institution's level of confidentiality.
3. Course materials, demonstration of proficiency, course evaluations, and ministry sequence materials are to be given to the student.

### **Information From Files**

Information from files is to be divulged only under the above guidelines.

### **Published Bethany Directory**

Published Bethany Directory information and other published materials by the Seminary can be given on request with no prior authorization.

### **Policy Statement on Students with Disabilities (Joint Policy)**

As a community of two Seminaries in partnership we approach a policy such as this from both moral and legal bases. We desire to be a community of equal opportunity in learning and extracurricular activities for all our students. We choose to begin our policy statement with the following quote from the National Council of Churches (NCC) which articulates the motivation toward equality within the lives of followers of Christ.

"Indeed, the body does not consist of one member but of many." (1 Corinthians 12:14) One in five Americans lives with impairment that significantly limits one or more major life activities. Virtually everyone will live with a disability at some time in life. Concepts of justice for people with disabilities have evolved beyond paternalism toward the ideals of full participation and inclusion in all aspects of life. Disability rights and self-advocacy movements have emerged. At the national level, landmark laws such as the Rehabilitation Act, the Individuals with Disabilities Education Act (IDEA), and the Americans with Disabilities Act seek to assure the same rights to people with disabilities that are guaranteed to all other people in our society.

The religious community also has taken a number of initiatives. Beginning in 1958 and as recently as 1995, the NCC has affirmed its belief in the dignity and worth of all people, including those of us with disabilities. Most NCC member communions have issued statements calling for the full inclusion of people with disabilities in all aspects of church life. In spite of these efforts, attitudinal, communication, and architectural

barriers remain. The church has served as a point of entry for many marginalized individuals into the mainstream of society. Now the time has come for the NCC to reaffirm and broaden its commitment to people with disabilities.

This policy statement rests upon eight theological principles.

1. All people are created in the image of God
2. "Then God said, 'Let us make humankind in our image . . .'" (Genesis 1:26) God creates all human beings in the divine image or likeness. This image is not a measurable characteristic or set of characteristics. God's image is reflected uniquely in each person.
3. All people are called by God
4. "For we are what (God) has made us, created in Christ Jesus for good works, which God prepared beforehand to be our way of life." (Ephesians 2:10) God calls all human beings to express the divine image through their unique characteristics. Each person's characteristics, including disabilities, are inseparable and valuable features of the unique, indivisible person.
5. All people have special gifts
6. "Now there are varieties of gifts but the same spirit. . ." (1 Corinthians 12:4) God supplies all human beings with the unique gifts needed to obey the divine call. All other people need the gifts God has given to each person, and no one is dispensable or unnecessary.
7. All people are invited to participate in God's ministry
8. "To each is given the manifestation of the Spirit for the common good." (1 Corinthians 12:7) God invites all human beings to rely on and participate in the ministry of the church.

God continually empowers each member of the Body of Christ to reflect the divine image in ways that will serve and benefit the church and the broader community.

### **Statement of Non-Discrimination**

Bethany Theological Seminary and Earlham School of Religion (hereafter referred to as: the Seminaries) do not discriminate on the basis of disability in the administration of the education programs and activities, including admission practices, and access to their programs and services. The purpose of this policy is to ensure that students with disabilities have maximal independence and full integration into campus life and shall be prepared for further education or employment. The Seminaries' efforts to accommodate people with disabilities will be measured against the goal of full participation and integration. Services and programs to promote these benefits for people with disabilities shall complement and support, but not duplicate, the Seminaries' regular services and programs.

A person with a disability shall be ensured access as all others to programs, opportunities, and activities at either Seminary. Information concerning the provisions of the Americans with Disabilities Act of 1990 and the Rehabilitation Act of 1973, Section 504 (hereafter referred to as the Acts), the rights provided there under, and

specific policies regarding non-discrimination of students with disabilities are available from the Director of Student Development of each Seminary.

### **Definitions of Disability**

The standard definition of a person with a disability is any person who has a physical or mental impairment that substantially limits one or more of the major life activities of such an individual, or any person who has a record of such an impairment or who is regarded to have such an impairment. Disabilities fall into several broad categories such as learning, physical, mental and health impairments.

1. **Learning disabilities:** Capable students are sometimes found to lack the cognitive tools necessary to read, listen, speak, write, or calculate on a level comparable to their intelligence. To be legally recognized and supported within the Seminaries as a “disabled” student, this student needs to provide documentation of diagnosis and methods of testing administered by either an education specialist, a psychologist, or other qualified examiner.
2. **Mental disorders disability:** Common mental health diagnoses affecting students are: depression, bipolar disorders (manic/depressive), anxiety disorders, Post Traumatic Stress Disorder (PTSD), panic disorders, and sleep disorders. Disorders less frequently seen in students are schizophrenia, and schizoaffective or character disorders. A single episode of a mental disorder does not constitute disability. The student needs to submit information regarding what medications and/or treatment s/he is receiving and any side effects attendant with medication usage. In making a determination as to whether the student is disabled by his/her condition, the Seminaries will consider all the circumstances associated with the condition and treatment and make an individualized determination as to the severity of the condition.
3. **Physical disabilities:** Common chronic and debilitating physical conditions might include, but are not limited to examples such as blindness, poor vision, deafness, poor hearing, speech impairments, long term need for a wheelchair, AIDS, HIV positive, epilepsy or Chronic Fatigue Syndrome (CFS). To qualify as a disabled student, the disability must be diagnosed and documented by a medical doctor or other qualified examiner.

### **Confidentiality of Students with Disabilities**

The Seminaries are committed to protecting the privacy and dignity of all students. In compliance with the Acts, along with the Family Education Rights and Privacy Act, the Seminaries agree to request only such information that is deemed necessary to enable students or potential users of the facilities to appropriately access such facilities and services. Moreover, the Seminaries will not disclose such information beyond that authorized by these laws.

The Seminaries will maintain the confidentiality of a student’s medical and academic records. Among the reasons that the Seminaries may disclose information about a student’s disability are the following:

1. Faculty, staff, and other appropriate parties, including tutors, may be informed of a student's disability for the purpose of facilitating essential aid and accommodations. Every attempt will be made to inform the student when confidential information has been passed on.
2. First aid and safety personnel may be informed when necessary, if the student requires emergency treatment.
3. Government officials investigating compliance with the Acts shall be provided with relevant information upon request.
4. No representative of the Seminaries may make public, to individuals or a group -- such as a classroom of students -- information regarding the disability of a student, except when the conveyance of such information meets the above-mentioned conditions or unless authorized to do so by the student.

### **Reasonable Accommodations**

The Seminaries are committed to provide a Seminary education that prepares individuals with disabilities for ministry. The nexus of accommodating students' disabilities lies in the faculty and student relationship. Instructors and advisors work together to provide accommodations appropriate for the student, while at the same time maintaining institutional standards so that all students receive a comparable graduate-level education.

Reasonable accommodations are those that help the student but do not cause undue hardship on the institution. Some examples of reasonable accommodations are:

1. Extra time to complete tests and assignments may be granted.
2. Students may be allowed to tape classroom lectures and discussions.
3. Students may be allowed to photocopy another student's class notes.
4. Directions are given clearly and in both oral and written forms.
5. Instructors are available for discussion and questions between class meetings.

Example: posted "Office Hours."

All requests for accommodations must be viewed in their proper context. In some cases, the Seminaries would need to deny a requested accommodation because it would render the student not qualified to pursue his/her education.

Other accommodations may be denied based on cost, whereby the Seminaries can afford equal access for lesser cost. In some cases, a requested accommodation would result in an undue burden, put the student or others at risk, result in a fundamental alteration of the program or be fundamentally unfair to the other students.

If a student wishes to challenge the denial of a particular accommodation, s/he may do so by filing a complaint with the Academic Dean who has been designated the Seminaries' grievance officer. The Academic Dean will review the complaint in accordance with our grievance procedures and promptly reach a resolution.

Students with an accommodation plan will abide by the Assignment Deadline Policy of the Joint Seminaries.

## **Implementation**

### **General**

1. The Director of Student Development shall be designated to work with students who have disabilities. A system of services shall be developed and maintained to facilitate the provision of access for students with disabilities to all academic programs, services and activities. This system shall integrate students with disabilities into the academic environment to the maximum extent possible.
2. All students defined within this process who qualify as disabled shall be entitled to reasonable accommodations and appropriate academic adjustments regardless of their status (full or part-time, class rank, or level).
3. In-service training shall be provided to faculty and staff the purpose of which will be threefold:
  - To heighten awareness of existing barriers
  - To promote accurate perceptions of students with disabilities regarding their abilities, needs, and rights; and of the institution's accessibility; and
  - To offer tools and ways to enhance accessibility.
4. A grievance procedure shall be developed and maintained by each Seminary. The procedure shall incorporate due process and provide prompt and equitable resolutions to complaints regarding the denial of services, adjustments, or accommodations.
5. All programs, services, activities, and physical structures shall be evaluated on a regular basis to ensure that existing barriers are ultimately removed or other forms of accommodation are made and that new barriers are not erected. The Executive Director of Student and Business Services and other appropriate administrators shall coordinate the evaluation.

### **Student Responsibilities**

In order to secure the needed accommodations the student must inform the school of his or her disability. This "self-disclosure" must follow the procedures outlined below.

### **Long-Term Disability**

Students with long-term disabilities who seek accommodations must provide the Seminaries with professional documentation, certified by any of the following licensed practitioners: physician, psychologist, audiologist, speech pathologist, rehabilitation counselor, physical therapist, occupational therapist, learning disability specialist, or any other health care provider who is qualified to diagnose the disability in question. The documentation must be based on tests that are normed to the adult level and provide the information that is needed to pinpoint substantial limitations. The student must bear the cost of evaluation and verification.

Documentation of a learning disability should include the following: 1) documentation prepared by a qualified professional; 2) testing procedures and instruments used to diagnose the student's present level of functioning in the achievement areas affected by the disability.

The data provided should clearly indicate the need for accommodations and a list of specific accommodations that will aid the student.

### **Temporary Condition**

Although the Acts do not extend legal coverage to temporary impairments, conditions or injuries, within our limited resources, the Seminaries seek to work with any student who has some kind of physical, mental or health limitation posed by an occurrence in his/her life. The guidelines for verifying a temporary condition are generally the same as those for verifying a long-term disability, however, documentation for a temporary condition must be no older than 60 days and should indicate the nature and expected duration of the condition.

### **Documentation Processing**

All documentation should be delivered to the Director of Student Development of the school in which the student is enrolled. The student must include a signed "Release of Information Statement," allowing the Seminaries to inform key personnel (see confidentiality section for more detail) of relevant information regarding the student. The Director of Student Development has "Release of Information" forms available. The Seminaries reserve the right to request further documentation if that provided by the student is deemed inadequate. The student shall bear the cost of supplemental evaluations and documentation. If the Seminaries wish to secure a second opinion regarding the disability of a student, then the Seminaries shall bear the cost.

1. Schedule a meeting with the Director of Student Development and complete an academic accommodations plan, designed and established by the student and the Director of Student Development.
2. Contact his or her instructors and provide a copy of the academic accommodations plan after the documentation has been submitted. Ideally this process will take place after admission and before the end of the first drop/add period that applies to the course(s) for the student's first session of studies;

However, there will be instances where the student is both taking courses and getting documentation of the disability. In these cases the student must inform his/her instructors as early in the session as possible in order to secure timely accommodations.

3. Work in cooperation with the Director of Student Development, advisor and the instructors in implementing the academic accommodations plan.
4. Any grievance involving questions around disabilities and instructional accommodations should first be addressed between student and instructor. If this does not work then the grievance procedure in place at each Seminary should be followed.



### **Admissions Office/Educational Policies & Advisory Committee Responsibilities**

No representative of the Seminaries may ask a candidate if he or she has a disability; nonetheless, the admissions offices should do three sets of things with diligence and sensitivity:

1. Make information about the Seminaries' disability services and procedures readily available to all prospective students
2. Introduce newly matriculated students with disabilities to the Director of Student Development
3. Facilitate comfortable and expedient self-disclosure on the part of students with disabilities.

The following guidelines are suggested:

1. Encourage students with disabilities to contact the Director of Student Development as early as possible to better ensure that they receive appropriate accommodations in a timely manner.
2. Be familiar with the contents of this policy and procedure document, and make this document available to students upon request.
3. Convey any relevant information to the Director of Student Development.

### **Faculty Responsibilities**

Faculty members shall do their part to ensure that students with disabilities receive the accommodations they need, as determined by the student's academic accommodations plan. Faculty should keep the following guidelines in mind:

1. Include in the course syllabus a statement indicating that disability services are available to students who qualify for such services.
3. The statement should include the name, extension number, and e-mail address of the Director of Student Development.
4. If a recommended accommodation does not seem appropriate to the faculty member, s/he may choose to discuss his/her concerns with the student.
5. If the student and the faculty member are unable to resolve the matter to their mutual satisfaction, the student is directed to notify the Director of Student Development, who will investigate the matter and attempt to informally resolve the disagreement between the student and the faculty member.
6. The student may also choose to file a formal grievance.
7. Work in cooperation with the student and the Director of Student Development in implementing the recommended accommodations plan.

### **Process for Policy Revision**

The Office of the Academic Dean of each Seminary is responsible for official interpretation of this policy. Policy changes will be reviewed and approved by the Joint Faculty Meeting. Final approval of any changes rests with each partner Seminary's Board of Trustees after the faculty of each partner Seminary approves and recommends them to the Board. Reasonable changes in policies, procedures, and practices shall be made, if necessary, to protect individuals from discrimination. The Presidents, the

Academic Deans, and all the employees are responsible for ensuring compliance with the requirements contained in section 35.107 of the Department of Justice regulations.

### **Ministry Formation**

The Bethany Catalog is the primary source of information on academic policies. Please see the additional information contained in the Ministry Formation Handbook.

### **Guidelines for Receiving Ministry Formation Elective Credit for Prior Ministry Experience**

1. Conditions for using past ministry experience for credit:
  - a. This provision is primarily for those persons who come into the MDiv program with previous extensive full-time ministerial experience.
  - b. Ministry assignment completed within three (3) years of request to use past experience;
  - c. Ministry must be a total of 400 hours or more of ministry practice;
  - d. Availability of pastor(s) on site, a local ministerial colleague, district executive, overseer, or district ministerial committee to attest to the minister's growth and learning in the practice of ministry; this person should also be able to assess the minister's strengths in ministry and areas for needed learning;
  - e. Availability of small group (3-6 people) from ministry site who can attest to how the minister's practice of ministry was experienced including strengths and areas of needed learning; and
  - f. Artifacts describing or showing the areas of ministry engaged in by the minister. (e.g., job descriptions, Sunday bulletins, committee minutes, diary of ministerial activities, etc.).
2. Process for enrollment:
  - a. Student speaks with faculty advisor and Ministry Formation faculty concerning prior ministry experience credit. Ministry Formation faculty must approve the use of the experience.
  - b. Ministry Formation faculty confirms with Joint Seminaries Registrar to enroll the student for this course.
3. Written Requirements - Reflection Paper:

A 25-30-page paper will be submitted to the Ministry Formation faculty and the student's faculty advisor for evaluation. This paper will contain the following elements:

  - a. A thorough description of the ministry assignment(s), the time of service, how the ministry assignment helped you to grow as a ministering person, etc.;
  - b. A report from the pastor, ministerial colleague, district executive or ministry commission describing the minister's growth in practice, professional issues that arose during the minister's tenure, and assessment of the minister's strengths and areas for additional learning (guidelines below);
  - c. A report from a small group receiving ministry from the minister describing the ways they have seen the person practicing ministry, areas of professional

- growth and maturity, and skills/areas requiring more learning (guidelines below); and
- d. An extended reflection by the minister on his/her work in the setting addressing the following questions:
    - What is your definition of ministry growing out of these experiences? Illustrate and elaborate your definition from your work;
    - How does this definition fit in relationship to the various sources of authority and guidance the church used to interpret practice? (i.e., scripture, the church's history and doctrine, the cultural context, and personal experience);
    - Are you satisfied with the way your understanding of ministry stands within the tradition, as you understand it? Why? Why not?
    - What are your most significant learnings from this ministry experience?
    - How did this experience clarify your call to ministry?
    - What do you need to learn next to be a more effective and faithful minister?
  4. Interview with Ministry Formation faculty and Minister-in-Training's Advisor:  
When the paper is completed and submitted to the Ministry Formation office in triplicate, the student schedules an interview with the Ministry Formation faculty and the minister-in-training's advisor. During the interview, significant learnings and issues will be discussed and a plan for continuing learning will be developed.
  5. Receiving Credit:  
Ministry Formation Elective credit for the past ministry experience will be determined by the Ministry Formation faculty and the minister-in-training's advisor. This option will be worth three hours of credit. Granting of credit may include additional work by the minister as specified by the Ministry Formation faculty and faculty advisor at the time of the interview.
  6. Evaluation:  
A summary of the interview, the learning plan and the record of the credit/noncredit evaluation will be placed in the ministry formation student file, in the Ministry Formation Office.
  7. Fees:  
All tuition and fees apply.

## Fair Use and Copyright Best Practices Guidelines for Faculty, Staff, and Students

### General Practices

- Always use copyrighted works owned or obtained by Earlham Libraries whenever possible. Personal copies are not the preferred source for materials.
  - Keep in mind that ownership of a copy of a work (having legally purchased something) is not the same as ownership of the underlying copyright for what has been purchased.
- Always provide copyright attribution when using copyrighted materials (articles, essays, excerpts from books, and all types of media), giving the proper citation information in presentations, bulletins, and all forms of writing.
  - Post a statement about use of copyrighted materials in each course within Moodle, such as: "COPYRIGHT NOTICE: The materials on this course Web site are only for the use of students enrolled in this course for purposes associated with this course and may not be further disseminated."
- Always limit access to copyrighted materials via course-specific password protection (e.g. in courses within Moodle), use technology protections to prevent downloading and distribution, and educate students not to duplicate or distribute.
- Always determine the setting/context in which copyrighted material will be used: classroom, chapel, sermon, Sunday School, public event, etc. Fair use typically applies to the classroom, while chapel at the seminary (as an educational setting) is less clear. Sermons in congregations and public events are typically not covered by "fair use."
- Always determine the format in which your use of copyrighted material will occur: written (of various genres), oral presentation, presentation with slides, etc.
- Always conduct a "fair use analysis" prior to using materials. See the Fair Use Checklist.
- Always modify your use if it is not appropriately fair use, or obtain permission to use copyrighted material from the rights holder with assistance from Earlham Bookstore.
- Always obtain public performance rights if planning to screen a film/DVD/video for more than the students enrolled in a course. Viewings in the context of churches, youth groups, and other church-related events are also subject to copyright laws. Church is typically not considered an educational context, and thus sermons do not typically qualify as "fair use." Companies offer licenses to show clips and full media in such settings, such as the Church Video License or ScreenVue from CCLI.
- Copyrighted material being used in its entirety (i.e. not within the limits covered under fair use) is best made available in class or by placing physical copies on reserve in at Lilly Library.
- Copyrighted materials should not be made available over consecutive semesters in Moodle (repetitive use).
- Linking to copyrighted works is always best, when possible. For example, instead of placing a PDF copy of an article from the JSTOR database in a course within Moodle, use within Moodle a link to a stable URL present on each article page in JSTOR. Ask a librarian to help create such links.

## “How Much Can I Use?": Fair Use Practices

- According to US Copyright Office: “Under the fair use doctrine of the US copyright statute, it is permissible to use limited portions of a work including quotes, for purposes such as commentary, criticism, news reporting, and scholarly reports. There are no legal rules permitting the use of a specific number of words, a certain number of musical notes, or percentage of a work. Whether a particular use qualifies as fair use depends on all the circumstances.” (italics added; see the “four factors of fair use” on the Fair Use Checklist; [www.copyright.gov/help/faq/faq-fairuse.html](http://www.copyright.gov/help/faq/faq-fairuse.html)).
- The “four factors of fair use” are used to determine whether use of copyrighted materials is appropriately under “fair use” or not. These are: purpose of the use; nature of the copyrighted material; amount copied; effect on the market for original. See the Fair Use Checklist contained within this document for more detail.
- While the Four Factors are helpful, practices based on broader academic library community and legal precedents suggest that “less is always best” when using copyrighted works for educational purposes, including scholarly research or teaching.
- A helpful (and humorous) illustration of fair use called “A Fair(y) Use Tale” can be found at ([https://www.youtube.com/watch?v=CJn\\_jC4FNDo](https://www.youtube.com/watch?v=CJn_jC4FNDo)). A detailed 2012 report from the Association of Research Libraries on Fair Use is available.
- Guidelines for “amounts” of material that can be used (remember: “less is best”).
  - Print Materials, owned or obtained by Earlham Libraries or otherwise legally acquired
- Books, without chapters or fewer than 10 chapters (including collection of essays): 10%. Count the total number of pages, including indices and bibliography.
- Books, with 10 or more chapters: one chapter.
- A single article in a single journal issue, magazine issue, or newspaper issue
- A short story (i.e. a work of fiction) or a short poem. Use of poetry and short stories, especially in public or reprinting, can be complicated and expensive.

## Graphics/Images/Online Videos

- A single cartoon, chart, diagram, drawing, graph, or illustration
- Always try to employ “free to use or share” images if resorting to Google Images (filter by “Usage Rights”), or turn to resources such as Wikimedia Commons. Look for images with a Creative Commons license, and follow the terms therein.
- With online videos (such as found on YouTube), linking to them is best rather than embedding.
- You are not responsible for another person’s copyright violation (i.e. what is on YouTube or another website), but you are responsible for your own use of that material (i.e. identifying where you found it or used it appropriately).
- It is a best practice to provide the source information for where you located material online (images, websites, videos), following appropriate citation style.

#### Audiovisual Content on DVDs or other media (Films, Television, etc) and Music

- It is permissible for all instructors to extract short clips from DVDs for educational purposes. Note that clips do not constitute wholesale streaming of audiovisual material and it does not cover the entirety of the work.
- The Four Factors apply to audiovisual content as well.
- The same permission extends to: “university film and media studies students,” “documentary filmmaking,” and “noncommercial videos”.
- See US Copyright Office, Section 1201 Exemptions to Prohibition Against Circumvention of Technological Measures Protecting Copyrighted Works.
- See Music Publishers FAQ (<http://www.mpa.org/content/copyright-faq>) for more information on photocopying print scores.
- A digital audio file owned or obtained by Earlham Libraries or otherwise legally acquired may be available to students via systems that limit access to students enrolled in the course. The Music Library Association (<http://copyright.musiclibraryassoc.org>) offers additional copyright resources.

#### Music in chapel and at events

- The same guidelines as above apply, but with additional concerns.
- When using music (whether lyrics, notes, or both) in the context of singing and worship (but not a concert or performance), it is important to include the appropriate copyright license information either on the projected screen or on the bulletin or both. Bethany Theological Seminary has two different licenses for music use: CCLI (#1967782) and OneLicense (#A-722650). If you are not doing this as part of the Bethany community, then your organization needs to use its own license numbers.
- When using music in chapel or at events, please consult the databases on the websites for CCLI and OneLicense to verify that the song(s) is covered. If it is not in the database, then it is not covered. It does not matter whether it appears in the hymnal or other printed songbooks. The song must appear in at least one of these databases in order to be covered by Bethany’s license.
- Typically, if the music publisher is covered in the database, then all of the publisher’s songs are covered.
- If the song is not in either database, then it cannot be used legally without other permissions being obtained.
- If the chapel service (or other event containing worship) is webcast, streamed, or made available as a podcast, the OneLicense covers the use (same license #) and we have a different license number with CCLI (#CSPL062425). OneLicense is valid for as many as 100 people while the CCLI is valid for up to 199 people. Again, if you are not doing this as part of the Bethany community, then your organization needs to use its own license numbers.
- The largest music database is BMI. Licenses or single-use fees are available for materials that may not be covered by the more traditionally church music oriented licensing groups, CCLI and OneLicense.

## Public Domain

- Some works are considered to be in the “public domain” and therefore not governed by copyright regulations.
- There are a few clear principles to determine if something is “public domain”.
- Anything published prior to 1923 is in the “public domain”.
- Typically, copyright expires 70 years after the death of the author.
- Anything published after 1923 may or may not be in the “public domain” depending on whether the original copyright was renewed or not.
- Cornell University has developed a helpful chart for determining if something is in the “public domain”. See:  
<https://copyright.cornell.edu/resources/publicdomain.cfm>
- Stating “Public Domain,” when appropriate, replaces the copyright, license, or permissions notice (on presentations, in bulletins, or in courses within Moodle).
- Questions about copyright, fair use, permissions, and copyright compliance should be addressed to the following:  
Steven Schweitzer, Academic Dean, 765.983.1815

## Fair Use Checklist for Conducting an Analysis before using Copyrighted Materials

This checklist is designed to assist you in applying the balancing test for determining whether you may make or distribute copies of works protected by copyright without having to obtain permission of the copyright holder. It is recommended that you *complete and retain* a copy of this form in connection with *each* "fair use" of a copyrighted work.

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Class or Project: \_\_\_\_\_

Title of Copyrighted Work: \_\_\_\_\_

Portion to be used (e.g. pages, video time): \_\_\_\_\_

### Directions:

Check all boxes that apply. For each of the four sections below, determine whether that factor favors or disfavors fair use. Where the factors favor fair use outnumber the factors against it, reliance on the fair use exception is justified. Where less than half of the factors favor fair use, permission should be obtained before copying or disseminating copies of the work. Select the appropriate final box at the end. Where the factors appear evenly split or you have questions about interpretation, please contact one of the identified individuals on the Best Practices Guidelines.

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### PURPOSE OF THE WORK

#### Favoring Fair Use

- Educational
  - Teaching
  - Research, Scholarship
  - Criticism, Comment
- Transformative or Productive use  
(changes work to serve a new purpose)
- Nonprofit use

#### Disfavoring Fair Use

- Commercial, entertainment, or other
- Non-transformative, verbatim/exact copy
- Profit-generating use

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### NATURE OF THE COPYRIGHTED MATERIAL

#### Favoring Fair Use

- Factual, nonfiction, news
- Published work

#### Disfavoring Fair Use

- Creative (art, music, fiction) or consumable (workbooks, tests) work
  - Unpublished work
-



## AMOUNT COPIED

### Favoring Fair Use

- Small quantity (e.g. a single chapter or journal article or other excerpt consisting of less than 10% of entire work)
- Portion used is not central to entire work
- Amount is appropriate to education purpose (not more than is needed)

### Disfavoring Fair Use

- Large portion or entire work
- Portion used is central or the “heart” of the work
- More than is necessary is used

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## EFFECT ON THE MARKET FOR ORIGINAL

### Favoring Fair Use

- No significant effect on market or potential market for copyrighted work
- One or few copies made and/or distributed
- No longer in print; absence of licensing mechanism
- Restricted access (limited to students in one class or other appropriate group)
- One-time use, spontaneous use (no time to obtain permission)

### Disfavoring Fair Use

- Cumulative effect of copying would be to substitute for purchase
- Numerous copies made and/or distributed
- Reasonably available licensing mechanism available (CCC or off-prints)
- Use will make it publicly available on Web or other means of broad distribution
- Repeated or long-term use

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### Result of Analysis for this Copyrighted Work:

- Favors Fair Use
- Disfavors Fair Use

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Adapted from Fair Use Analysis Checklist created by Cornell University.

