

Theological Education and Accreditation: A Critique and Proposal

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Abstract

This paper presents a theological critique of accreditation for Bible colleges and seminaries, urging a "holy insurgency" akin to the biblical counseling movement's rejection of state licensure. It argues that recognized accreditation, tied to the U.S. Department of Education and Council for Higher Education Accreditation standards, fosters financial dependence on federal funds, engenders student debt, suppresses innovation, and imposes secular values. Drawing on historical developments in accreditation since 1936, the analysis highlights cases where accreditors have pressured evangelical institutions to conform to non-biblical ethical standards, while accrediting schools promoting unbelief. As a proposal, the paper advocates renouncing the current accreditation establishment in favor of a formalized endorsement by the church. This approach emphasizes biblical authority, the supremacy of the local church in theological formation, and more effective metrics such as alumni ministerial impact and debt-free training.

Keywords: theological education, accreditation, seminaries, Bible colleges

A HOLY INSURGENCY

An insurgent movement seeks to invalidate and dethrone an established occupier. Insurgencies are almost always grassroots; a rebellion by everyday visionaries against systemic wrongdoing. From its inception, the biblical counseling movement has been a theological insurgency. It has sought to restore the church's understanding of counseling as an intrinsically theological task for which Scripture is sufficient. The biblical counseling movement has simultaneously sought to refute the psychotherapeutic establishment and integrationist counterinsurgency.

Key to the success of any insurgent movement is the establishment of new institutions that serve to herald and pursue the cause. In the case of the biblical counseling movement, many new institutions have been formed. These include accrediting bodies that have set ethical and theological standards for the practice of biblical counseling. Chief among these certifying institutions is The Association of Certified Biblical Counselors (ACBC). By design, the certification ACBC offers is not recognized by any governmental agency. There is no sanctioning body that has granted validity to ACBC. Rather, ACBC looks to local churches and other Christian ministries to recognize its credibility. In doing so, ACBC has intentionally defied the bureaucratic expectations of our culture. It has, upon the basis of the Lordship of King Jesus, set up shop *on biblical terms*. Whereas Licensed Professional Counselors, Licensed Mental Health Counselors, and others depend upon the state to approve their labor, ACBC and the biblical counseling movement have sought the approval of heaven.

The logic of ACBC (or any other biblical counseling certifying body) as an institution is clear. ACBC has effectively repudiated

secular counseling accreditation as relevant.¹ Just as the Lord's Supper and the public exposition of the Word of God reside within the jurisdiction of the local church, so does the cure of souls. There is neither a need nor a basis for governmental oversight or approval in these matters. Rather, the authority for ministry is bound up in the charter given by Christ to his people (Matt. 28:19).

HONOR THE LORD YOUR FAFSA

Inasmuch as counseling is the prerogative of God's people, so is theological education and ministerial training. In our day, most who desire to enter vocational ministry first attend either a Bible college or seminary (or both). This formalized training comes at a price, as the average Master of Divinity costs upwards of \$51,000.² Fortunately, most conservative seminaries accept student loans, such that seminarians may become enslaved (Prov. 22:7) to the federal government or private lenders just before entering the ministry.

Truly, the vast majority of conservative Protestant seminaries would not exist were it not for federal money. Seminaries that reject Caesar's cash derive much of their funding from tax-exempt local churches or have achieved operational solvency. For a Bible college or seminary to lay claim to federal money, that school must become accredited by an accreditor that holds recognition by the U. S. Department of Education (DOE).³ So

¹ See "Licensure," Association of Certified Biblical Counselors, accessed September 5, 2025, <https://biblicalcounseling.com/about/beliefs/statements-from-the-board/licensure/>.

² Judging from the 2024-25 data furnished by the Association of Theological Schools, the average for full-time per year cost for a Master of Divinity is approximately \$17,162. "Annual Data Tables," Association of Theological Schools, accessed September 8, 2025, https://www.ats.edu/files/galleries/2024-2025_annual_data_tables.pdf.

³ There are other reasons institutions seek recognized accreditation, including the illegality in some states of operating an unaccredited institution of post-secondary education. For instance, in my home state of CT, there is not a

too, there are other reasons institutions seek accreditation. For example, recognized accreditation is a form of statist approval, without which an institution is generally considered illegitimate at best. Jamin Hübner has observed, “Higher education in the ‘developed’ world, whether religious or not, tends to be arranged to favor education that is validated by a government.”⁴ Subsequently, “Accreditors generally function as an arm of the state.”⁵

Accreditation says almost nothing about academic rigor, let alone an institution’s fidelity to the historic biblical faith.⁶ Consider Union Theological Seminary (UTS) in New York City. UTS has accreditation from the Middle States Commission on Higher Education and the Association of Theological Schools. While UTS has the most prestigious accreditation possible, the education it affords is a morass of unbelief. In 2019, UTS offered a course entitled “Extractivism: Ripping Earth Apart: A Ritual/Liturgical Response,” which involved students confessing sin to plants.⁷

religious exemption clause for a degree-granting non-accredited Bible institute or seminary.

⁴ Jamin Hübner, “Obstacles to Change: Overcoming Hurdles of the State Apparatus in Higher Education,” *Journal of Religious Leadership* 16, no. 1 (2017): 21. Walston wrote similarly, “Quite simply, accreditation is validation.” Rick Walston, *Walston’s Guide to Christian Distance Learning*, 5th ed. (Maitland, FL: Xulon Press, 2007), 64. See also Barmak Nassirian, Thomas L. Harnish, “Does Accreditation Protect Students Effectively?” in Susan D. Phillips, Kevin Kinser, eds., *Accreditation on the Edge: Challenging Quality Assurance in Higher Education* (Baltimore, MD: Johns Hopkins Univ. Press, 2018), 233-34.

⁵ Hübner, “Obstacles to Change,” 22.

⁶ This is true even of what is arguably the most evangelical of recognized accreditors, the Transnational Association of Christian Colleges and Schools.

⁷ Cláudio Carvalhaes, “Why I Created a Chapel Service Where People Confess to Plants,” *Sojourners*, last modified September 26, 2019, <https://sojo.net/articles/why-i-created-chapel-service-where-people-confess-plants>.

FRIENDS, ROMANS, COUNTRYMEN: LEND ME YOUR CASH

Before 1936, higher education institutions established associations that set academic and institutional standards for member schools. While rigid and rudimentary, these standards formed the basis for early accreditation. In many ways, accreditors functioned more like a consortium than their contemporary counterparts. From 1936 onward, accreditation shifted to emphasize quality improvement, which implemented a process that included self-study and other facets of the modern accreditation process. By 1965, accreditation became the only means of accessing federal money via the GI Bill and other programs. The federal government published an annual list of approved accreditors, and only those schools that held authorized accreditation were eligible to receive federal funds.

Hampered by fraud and significant borrower default, the federal government implemented several stipulations through the Higher Education Act Amendments of 1992. These amendments regulated distance education and placed further quality assurance requirements on accreditors. However, consistent federal regulation has suppressed innovation within higher education, resulting in a predictable quality assurance strategy that neither accounts for borrower default nor competition in the higher education marketplace.

The issue of student debt became a national concern when the Biden administration unsuccessfully sought to alleviate approximately one trillion dollars of debt by fiat. Reports of students accruing vast sums of debt without viable employment abound. As it turns out, accruing tens of thousands of dollars of debt for a degree in woke dance theory is a poor investment. However, without an enormous endowment and the promise of Caesar's cash, it is doubtful that most institutions would maintain solvency. The decade-long trend of private college closures and the thinning of program offerings among well-established universities tells the tale: The federal government

and its proxies (i.e., accreditors) have created an environment where many institutions depend on student debt for survival.

For example, Liberty University, one of the largest evangelical universities in the world, reports that sixty-six percent of its students rely on federal loans and that the typical undergraduate student leaves with nearly thirty thousand dollars of debt.⁸ Meanwhile, Liberty has accrued more than two billion dollars in its endowment and receives over seven hundred million dollars from the government annually.⁹ Without its accreditation, Liberty's Divinity School would be wholly cut off from its primary source of funds. Its accreditation, therefore, serves as a gateway to revenue. While the school's administration may include many worthwhile motivations for maintaining its accreditation, it may be safely assumed that a significant motivating factor is cash.

When the Tail Wags the Dog

In 1996, university and college presidents formed the Council for Higher Education Accreditation (CHEA) as an additional means of accreditor recognition. Unlike the DOE, CHEA is a non-profit organization whose recognition process focuses on academic quality and institutional self-regulation, and its recognition is independent of the federal government. There is, however, substantial overlap between the accreditation standards and processes of CHEA and the Department of Education. The federal government also recognizes most CHEA-recognized accreditors. Because CHEA's accreditation standards are derived from the establishment class of higher ed (i.e., a cabal comprised mainly of university administrators), its

⁸ "Student Loan Consumer Information," Liberty University, accessed March 3, 2025, <https://www.liberty.edu/student-financial-services/consumer-information/loans/>.

⁹ "Annual Disclosure Report," Liberty University, last modified November 23, 2022, <https://www.liberty.edu/student-financial-services/wp-content/uploads/sites/118/2022/12/Liberty-University-FY22-Continuing-Disclosure-with-Audited-Financials.pdf>.

standards are not significantly distinct. This vast overlap implies that CHEA recognition is cut from the same cloth. While CHEA recognition is not the gateway to federal cash, its accreditors are generally beholden to Uncle Sam. Although CHEA offers a means of accreditor recognition independent of the DOE in theory, it is an organization prone to relying upon and conforming to DOE expectations. Because CHEA's major accreditors also hold DOE recognition and are therefore influenced by federal funding, CHEA is continually impacted by the government through its accreditors. Subsequently, CHEA's standards and policies function akin to the tail wagging the dog. Like the DOE, CHEA's standards stifle innovation at a cost that is eventually passed on to students.

It is also an organization firmly committed to the zeitgeist: "We believe that the rich values of diversity, equity, and inclusion are inextricably linked to quality assurance in higher education. Additionally, CHEA affirms that diversity, equity, and inclusion contribute to student success; and, that student success contributes to a better, healthier, and more enlightened, progressive society."¹⁰ These values do not affect the metrics that matter most to students, including actual academic quality, institutional stability, and, in the case of theological education, fidelity to the Christian faith. Furthermore, one wonders why any theological institution committed to the biblical faith would seek to align itself with an institution that promotes the DEI agenda and believes that DEI is an integral part of the quality of higher education.

ACCREDITATION AND LEGITIMACY

While most equate "accredited" with "legitimate," achieving accreditation mainly reveals a school's conformity to the administrative and financial expectations of the accreditor and,

¹⁰ "Diversity, Equity and Inclusion Statement," Council for Higher Education Accreditation, last modified May 3, 2021, <https://www.chea.org/diversity-equity-and-inclusion-statement>.

by extension, the federal government. Recognized accreditation cannot answer the questions most students might ask of a Bible college or seminary: “Is the faculty faithful unto God?,” “Is the curriculum effective and God-honoring?,” “Will I receive the best training here?” or “Will an education at this school prepare me for the mission field?”

Any doubt about government control through recognized accreditors should have evaporated when the New England Association of Schools and Colleges (NEASC) implied that Gordon College’s policy on homosexual practice was out of step with its accreditation standards.¹¹ Another example can be seen in the treatment of the Master’s University by one of its accreditors, the Western Association of Schools and Colleges (WASC). WASC has sought to enforce ethical standards and practices upon Master’s,¹² just as with NEASC and Gordon College. One would expect a Christian institution to form its ethical practices upon the basis of a biblically informed Christian worldview rather than the ephemeral mores of a secular accreditor.

Similar observations can be made in light of the treatment of two other evangelical institutions by recognized accreditors, namely, Patrick Henry College and Westminster Theological Seminary (Philadelphia). Patrick Henry College sought accreditation with the American Academy for Liberal Education but was denied because of its commitment to creationism.¹³ The Middle States Association of Colleges and Schools (MSACS)

¹¹ David French, “Gordon College Keeps Its Faith and Its Accreditation,” *National Review*, last modified May 1, 2015, <https://www.nationalreview.com/2015/05/gordon-college-keeps-its-faith-and-its-accreditation-david-french/>.

¹² See WASC’s action letter to Dr. John MacArthur dated July 18, 2018: <https://wascsenior.box.com/shared/static/c6ojdrd8tt4w1le7it98nyag0z7d6gzb.pdf>.

¹³ Latonya Taylor, “Christian College Denied Accreditation,” *Christianity Today*, last modified July 8, 2002, <https://www.christianitytoday.com/ct/2002/july8/15.16.html>.

threatened to revoke Westminster's accreditation in the 1990s because its oversight board lacked female members.¹⁴ Westminster's charter requires its board to be comprised of ordained elders. A year later, MSACS rescinded its threat when Westminster agreed "to give women a voice in its educational decision-making process."¹⁵

R-e-s-p-e-c-t

In the same way that the biblical counseling movement usurped the status quo for its certification, rejecting state or secularist approval, Bible colleges and seminaries ought to consider the same. Many private Christian K-12 schools have taken this path, and accreditors such as the Association of Christian Schools International (ACSI) and the Association of Classical Christian Schools (ACCS) have emerged to serve these institutions as a means of quality assurance, apart from secular involvement. To jettison DOE/CHEA recognized accreditation is, admittedly, to destroy an institution's credibility in the sight of the secular world.¹⁶ But our loyalties were never with this world. Not only would renouncing recognized accreditation vastly reduce the costs of operation for most schools, it would also emphasize evaluation upon different criteria: *The education itself*.

¹⁴ "Seminary May Lose Accreditation," *Christianity Today*, last modified October 22, 1990, <https://www.christianitytoday.com/ct/1990/october-22/education-seminary-may-lose-accreditation.html>.

¹⁵ Samuel Weiss, "Accrediting Agency and Seminary Agree on an Advisory Role for Women," *New York Times*, last modified June 19, 1991, <https://www.nytimes.com/1991/06/19/education/accrediting-agency-and-seminary-agree-on-an-advisory-role-for-women.html>.

¹⁶ In the eyes of many in academia, this has already been achieved— accreditation or not. Cf. the comments of Conn, who claimed that any school that affirms a confessional position at the institutional level ought to be denied accreditation on that basis. Peter Conn, "The Great Accreditation Farce," *The Chronicle of Higher Education*, last modified May 30, 2014, <https://www.chronicle.com/article/The-Great-Accreditation-Farce/147425>.

While many unrecognized accreditors and accreditation mills have engaged in some transparently spurious practices,¹⁷ there are unrecognized accreditors that offer a genuinely thoughtful, innovative, and alternative approach to quality assurance and institutional improvement. Some have argued that all unrecognized accreditors are necessarily illegitimate, or even “worthless,” as in the case of Rick Walston.¹⁸ Walston argues that if accreditation is not recognized, it is not real. Such a view gives away the store—subjugating theological institutions to the approval of the state by implication. If, through recognized accreditation, the government and a cabal of university insiders (i.e., the CHEA) are the only entities that can genuinely vouch for the credibility and legitimacy of an institution, these entities serve as the gatekeepers of theological higher education.¹⁹ Walston’s view is the statist view: unaccredited seminaries and Bible colleges must be satisfied with no external validation of their education, and any attempt to form a Christian accreditor that de-legitimizes the role of the state is immoral. By contrast, if we recognize the division of labor between state and church, there exists no good reason to trust the government to validate theological education, and any accreditation should come from the body of Christ.

The legitimacy of education is primarily determined by its acceptance in the marketplace. There are other worthwhile metrics (e.g., academic, civic, personal, or social), but these pale compared to the outsized importance of marketplace acceptance. In the case of ministerial education, churches

¹⁷ E.g., the Accrediting Commission International (ACI), which is the recapitulation of the now defunct International Accrediting Commission, which was shut down for fraud by the Attorney General of Missouri in 1989. See Walston, *Walston’s Guide to Christian Distance Learning*, 87. ACI “accredits” Bible colleges and seminaries even if they teach cultic doctrine. For example, ACI accredits Atlanta Bible College, the undergraduate institution of a non-trinitarian restorationist cult.

¹⁸ Walston, *Walston’s Guide to Christian Distance Learning*, 66.

¹⁹ See Blumenstyk’s statement: “Accreditors are hugely powerful gatekeepers,” in Hübner, “Obstacles to Change,” 22.

determine whether a seminary or Bible college has done its job effectively. A seminary whose alumni are known for their ministerial skill, theological precision, and passion for a biblical worldview will set itself apart. A Bible college that produces compassionate and effective missionaries will become known by its fruit. Recognition by the church, then, must be the gold standard of institutional legitimacy because theological education is the exclusive domain of God's people. The embrace of such a perspective effectively ousts the burdens of a convoluted bureaucracy in favor of the glory of God.

On the Legality of Operating an Unaccredited Bible College or Seminary

Currently, there are twenty-eight states that offer a religious exemption to higher education licensing, accreditation, and certification. In these states, unaccredited religious institutions operate with general autonomy, although some states require religious modifiers in the degrees issued by these institutions. Twenty-two states afford religious institutions no exemption,²⁰ effectively precluding any unaccredited Bible college or seminary from issuing degrees.²¹ The rationale traditionally put forward by those states that possess no religious exemption is that the lack of such an exemption effectively outlaws degree mills. Such laws, however, are fine examples of gross unconstitutional overreach since states cannot legally preclude religious higher education or the establishment of religious schools of higher education designed for ministerial training.

²⁰ Cf. Morgan Lee, "Should Unaccredited Bible Colleges Be Allowed to Grant Degrees?," *Christianity Today*, last modified March 26, 2015, <https://www.christianitytoday.com/ct/2015/april/should-unaccredited-bible-colleges-be-allowed-grant-degrees.html>.

²¹ See for example, Public Act No. 13-118 in the author's home state of Connecticut: "No person, school, board, association or corporation shall operate a program of higher learning or an institution of higher education unless it has been licensed or accredited by the State Board of Education Office of Higher Education, nor shall it confer any degree unless it has been accredited in accordance with this section."

The domain of Christian education for ministry belongs to the church.

It has become increasingly difficult for those states that do not afford a religious exemption to enforce or uphold their prohibitions of unaccredited religious colleges and seminaries since the landmark ruling in *HEB Ministries Inc. v. Texas Higher Education Coordinating Board*. In 1999, the state of Texas issued a \$173,00 fine to Tyndale Theological Seminary for issuing degrees apart from recognized accreditation or state certification and for identifying itself as a “seminary” apart from state consent. Arguing the unconstitutional nature of the Texas Education Code via the Free Speech Clause, Free Exercise Clause, and the Establishment Clause, the Supreme Court of the State of Texas ruled in favor of Tyndale in 2007.²² Douglas Laycock, Distinguished Professor at the University of Virginia School of Law, concluded, “The state has no business licensing seminaries or any other religious institution. It is shocking that the state even attempted such regulation.”²³

INSURGENCY: A WAY FORWARD

The great commission belongs to the church, and by implication, so does theological education and ministerial training. The successful training of pastors, missionaries, and parachurch leaders ultimately depends on the affirmation of the church. Therefore, the formalization of the church’s endorsement of theological seminaries and Bible colleges should replace the current arrangement in which Christians inadvertently depend on the divided interests of accreditors. This may be accomplished in myriad ways, whether through the approval of a local session of elders or a denominational

²² Reeve Hamilton, “Questions Surround Unregulated Institutions,” *New York Times*, last modified December 9, 2011, <https://www.nytimes.com/2011/12/09/us/questions-surround-unregulated-institutions.html>.

²³ Douglas Laycock, *Religious Liberty: The Free Exercise Clause*, vol. 2 (Grand Rapids, MI: Eerdmans, 2011), 606.

endorsement. Such a shift represents not a retreat but a crucial advance: a holy insurgency that reclaims the cure of souls and the equipping of saints from the entanglements of secular bureaucracy.

To enact this approach, a robust church-centered endorsement framework that prioritizes biblical fidelity over federal funding is needed. A consortium of denominations and independent churches—modeled after ACBC or a similar parachurch organization—forming a truly sensible and biblical basis of institutional evaluation may suffice. However, any consortium-style approach must maximize direct involvement of local churches lest it too become merely a bureaucratic middleman with divided interests. Such a body would establish standards grounded in Scripture, evaluating institutions on criteria such as doctrinal orthodoxy (e.g., formal and practical adherence to historic confessional formulations), the rejection of unbiblical teaching in curricula, and faculty commitment to the inerrancy of Scripture. Unlike DOE or CHEA accreditors, such an approach might require annual affirmations from partnering churches, ensuring accountability to the body of Christ rather than a parachurch organization. Metrics for success under this model would shift from administrative checkboxes to ministerial fruitfulness. Instead of measuring endowment sizes or diversity quotas, evaluations might track church hiring and retention rates, alum impact, missionary outcomes, and real-world costs.

This approach draws inspiration from existing alternatives. For instance, the Association of Reformed Theological Seminaries (ARTS) already provides a peer-reviewed framework for Reformed institutions, focusing on confessional standards without federal ties. Similarly, K-12 accreditors like the ACCS have thrived by emphasizing the integration of a Christian worldview, resulting in lower operational costs and higher parental satisfaction. By gleaning from organizations like these, an ecclesiastical recognition of theological schools would reduce accreditation expenses, often tens of thousands annually, and

thus the tuition and fees of the students. Of course, no insurgency is without challenges. Renouncing recognized accreditation will inevitably erode legitimacy in the eyes of those beholden to the current system. Insurgent institutions would have to forgo access to Caesar's cash. Yet, history shows these hurdles are entirely surmountable. ACBC overcame skepticism by earning trust through demonstrated outcomes: Certified counselors now serve in thousands of churches, validated not by the state but by the church through the transformed lives they have impacted. Local churches would find the establishment of theological educational institutions achievable once again.

Ultimately, this proposal calls theological educators to a higher allegiance: the Lordship of Christ. In doing so, we honor the biblical mandate to equip the saints (Eph. 4:11-12) without compromise, fostering a generation of ministers unencumbered by debt and undiluted by secularism. In doing so, God's people do not engage in rebellion against God-ordained authority (Rom. 13:1), but in faithful stewardship of our commission.

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