

## Policy on Substantive Change

A substantive change significantly alters an institution's mission, scope, control, geographical location, or delivery mode. Substantive changes for accredited institutions are reviewed by the Commission on Accreditation's Committee on Progress Reports and Substantive Change and for candidate institutions by the Committee on Applicant and Candidate Status.

### Changes Requiring a Proposal and Commission on Accreditation Approval Before Implementation

A substantive change requires that the institution submit a Substantive Change Proposal according to the format specified and including appropriate documentation, pay the substantive change fee, and receive Commission on Accreditation approval for the change prior to implementation.

#### 1. Change in Mission

Any change in the established mission or objectives of the institution

#### 2. Change in Scope

- a. Initiation of program(s) at a different degree or credential level from that which is currently approved (e.g., associate to baccalaureate, baccalaureate to master's, master's to doctorate)
- b. Major expansion at currently approved degree or credential level (i.e., addition of courses or programs that represent a significant departure from previously authorized programs regardless of modality)
- c. Introduction of an alternative Bible/Theology Studies requirement where 50% or more of the requirement is met through means other than Biblical Studies courses and/or Theological Studies courses
- d. Discontinuation of all graduate level offerings or all undergraduate level offerings (requires submission of a teach-out plan for affected students)
- e. Initiation of a contractual, consortial, or cooperative agreement where an institution or organization not certified for Title IV participation provides more than 25% of an academic program
- f. Initiation of an adult degree completion program
- g. Change from clock hours to credit hours or a substantial increase in the number of clock hours or credit hours required for completion of a program
- h. Acquisition of another institution, or program or location of another institution
- i. Addition of a permanent location at which the institution is conducting a teach-out

[c.f. Policy on Biblical and Theological Studies]

#### 3. Change in Control

- a. Initiation/discontinuation of a formal relationship with a denomination or fellowship
- b. Merger with another institution (requires a site visit within 6 months of change)
- c. Change in legal status, form of control, or ownership (requires a site visit within 6 months of change)

#### 4. Change in Geographical Location

- a. Relocation of main campus (requires a site visit within 6 months of implementation)

- b. Initiation or relocation of an additional location where 50% or more of a degree program may be earned by classroom courses, hybrid courses, or a combination of both (requires a site visit within 6 months of implementation)
- c. Initiation or relocation of a branch campus (requires a site visit within 6 months of implementation)
- d. Discontinuation of a branch campus or an additional location where 100% of a degree program may be earned (requires submission of a teach-out plan for affected students)

[c.f. Policy on Alternative Academic Patterns]

#### **5. Change in Modality**

- a. Initial offering of the first degree program(s) where 50% or more of the program is available via a new modality (e.g., distance, hybrid, or correspondence education) by course availability or institutional policy
- b. Initial offering of the first competency-based education program at an institution by the course/credit approach
- c. Initial offering of the first competency-based education program by a direct assessment or hybrid approach
- d. Offering a competency-based education program beyond the first by direct assessment
- e. Offering a competency-based education program beyond the first where 50% or more of the program will be available by the hybrid approach

[c.f., Policy on Alternative Academic Patterns, Policy on Competency-Based Education and Direct Assessment]

#### **6. Substantive Changes for Institutions on Warning, Probation, or Show Cause**

In addition to the substantive changes noted above, institutions on warning, probation, or show cause must treat the following as substantive changes. Submission of a substantive change proposal and Commission on Accreditation approval are required before implementation.

- a. Initiation of a contractual, consortial, or cooperative agreement where another institution or organization provides coursework required to offer an academic program
- b. Initiation of extension classes in a new location where less than 50% of a degree program may be completed
- c. Initial offering of courses using a new modality (e.g., distance, hybrid, or correspondence education)
- d. Initiation of programs other than the first degree program where 50% or more of an academic program may be completed by distance education (online), hybrid, or correspondence education

#### **Changes Requiring a Letter of Notification Before Implementation**

Certain changes that are not substantive in nature must be reported to the Commission on Accreditation. The Director, Commission on Accreditation, should be notified by electronic letter of the following non-substantive changes six months prior to implementation. Notification must be in writing and include a 1-3 page description of the change and projected implementation date. The Director will apprise the Commission on Accreditation of such changes at the next scheduled Commission on Accreditation meeting, at which time the Commission on Accreditation may limit the change, request additional information, or require monitoring reports to verify that the institution can implement the change without adversely affecting

educational quality. If an institution did not provide six months prior notification, an explanation of the reason why six month prior notification was not made should be included with the notification.

Changes to be reported before implementation:

- a. Initiation of programs that do not represent a significant departure from previously authorized programs (requires submission of program curriculum outline)
- b. Change in the name of an approved program
- c. Reinstatement of a previously approved program (requires submission of program curriculum outline)
- d. Discontinuation of an approved program
- e. Initiation of a contractual, consortial, or cooperative agreement where another institution or organization provides coursework required to offer an academic program
- f. Discontinuation of an adult degree completion program (requires submission of a teach-out plan for affected students)
- g. Change in academic calendar or credit values (quarter hours to semester hours, etc.)
- h. Abnormal turnover in board, administration, or faculty
- i. Initiation of extension classes in a new location where less than 50% of a degree program may be completed (notification must include physical address and planned curricular offerings)
- j. Discontinuation of extension classes in a given location
- k. Discontinuation of an additional location (requires submission of a teach-out plan for affected students)
- l. Initial offering of courses using a new modality (e.g., distance, hybrid, or correspondence education)
- m. Initiation of a competency-based education program beyond the first through the course/credit approach
- n. Initiation of a competency-based education program beyond the first where less than 50% of the program will be available by the hybrid approach
- o. Initiation of programs other than the first degree program where 50% or more of an academic program may be completed by distance, hybrid, or correspondence education
- p. Discontinuation of all instruction via an approved modality (face-to-face, distance, hybrid, correspondence)
- q. Change in the name of the institution

### Clarification, Definition of Terms, Provisions

1. **Different degree or credential level.** Candidate or accredited status is granted to institutions on the assumption of a specific level of curricular program offerings. For example, if an institution offers only a two-year diploma when it gains candidate or accredited status, it must receive prior substantive change approval to offer an associate or baccalaureate degree, since these represent a change from the higher educational level that was authorized at the time of initial accreditation or candidacy. Likewise, an institution that offers a higher credential must receive substantive change approval to add a lower credential (e.g., baccalaureate institution adding a one-year certificate, graduate institution offering undergraduate).
8. **Major expansion at current degree level.** If an institution introduces curricular programs which differ substantially from curricular programs offered at the time of initial candidacy, initial accreditation, or reaffirmation of accreditation, such programs constitute a substantive change. For example, if an institution offers five baccalaureate degree majors related to church ministry

when granted candidate or accredited status, and it subsequently proposes to introduce a baccalaureate degree program in elementary education or information technology, such a change would represent a major expansion at the current degree level, since it constitutes a significant departure from the range of programs previously authorized.

3. **Abnormal board, administrative, or faculty turnover.** This category refers to circumstances in which the magnitude and/or manner of board, administration, or faculty turnover differs from normal attrition. If 25% or more of (a) board, (b) cabinet-level administrators, or (c) full-time faculty resign or are dismissed during a 12-month period, or if the departure is precipitated by a rift that could destabilize the institution, such an event requires staff and/or Commission on Accreditation review in order to verify ongoing institutional stability.
4. **Academic calendar or credit values.** Examples include the following: (a) conversion from a quarter system to a semester system in recording credit hours; (b) changes in the length of terms (e.g., 15-week to 6-week, 10-week to 15-week) and (c) departure from established institutional practices and/or higher educational norms in terms of the amount of instructional contact or academic engagement required per credit hour.
5. **Modality.** This term refers to the way in which courses are primarily delivered as defined in the chart below. Adding a modality not already part of an institution's approved accreditation scope is considered a substantive change. An institution approved for both face-to-face instruction at a given location and distance education is approved for hybrid/blended courses at the same level (i.e., less than 50% of a program or 50% or more of a program) at that location.

#### Definitions of Modalities

Modality	Proportion of Instruction Delivered in a Face-to-Face Setting	Description*
Traditional	67-100%	Course content is delivered in a mandatory face-to-face setting. May use some technologically-mediated educational engagement strategies to enhance the course and/or to replace some face-to-face meetings.
Hybrid	1-66%	Some technologically-mediated educational strategies are used to replace at least 33% of face-to-face class meetings, but not all required face-to-face meetings.
Distance	0%	All course activity is done via technologically-mediated educational strategies; there are no required face-to-face sessions within the course and no requirements for on-campus activity; courses include substantive and regular faculty-student interaction.

Correspondence	0%	Instructional materials are delivered via mail or electronic means; there are no required face-to-face sessions within the course and no requirements for on-campus activity; faculty-student interaction is limited, not regular or substantive; typically courses are self-paced.
Mixed Modality	Student Choice	Students are able to choose between two or more modalities for each class session and/or learning activity depending on the student's schedule and learning preference.
Competency-Based Education	Variable	Academic credit by fulfillment of defined competencies regardless of time spent in class, study, or research.

\*These descriptions were informed by the working definitions from the Online Learning Consortium.

6. **Distance education.** Distance education is defined as education that uses one or more technologies to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously. The technologies may include the internet; one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices; audio conferencing; or video cassettes, DVDs and CD-ROMs, if the cassettes, DVDs, or CD-ROMs are used in a course in conjunction with any of the other technologies listed.
7. **Correspondence education.** Correspondence education is defined as education provided through one or more courses by an institution under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor. The interaction between the instructor and student is limited, is not regular and substantive, and is primarily initiated by the student. Correspondence courses are typically self-paced. Correspondence education is not distance education. Note: Correspondence education is not within ABHE's scope of recognition by the U.S. Department of Education.
8. **Competency-based education.** Competency-based education (CBE) is an outcomes-based system of instruction in which the student's demonstrated proficiency in specified knowledge or skills is the basis for measuring satisfaction of course, program, or degree requirements. CBE focuses on the achievement of learning outcomes (what a student knows or can do) as the direct measure of student learning, regardless of time spent in class, study, or research, which is an indirect measure of student learning. See the Policy on Competency-Based Education and Direct Assessment for requirements and evaluation criteria.
9. **Extension site.** Extension education (including extension classes and extension sites) refers to a situation where students and faculty meet in classes held in a location removed from the main campus, and where less than 50% of an educational program may be earned. If students are expected to attend a regular session of a class on an ongoing basis at an off-campus location, that location is considered an extension site if less than 50% of a degree program can be earned through a combination of such courses and traditional face-to-face classes at that location.

- 10. Additional location.** Additional location, as defined by USDE regulations, refers to a location remote from the main campus where students and faculty regularly meet in classes and where students may complete 50% or more of course work toward requirements for one or more of the institution's educational programs. Site visits are always required in connection with establishment of up to three additional locations, and will be conducted within six months of establishment of the location. In cases where an institution establishes more than three additional locations, ABHE has established guidelines governing the necessity of site visits and the manner in which additional locations will be monitored. These guidelines, and their accompanying procedures, are spelled out in ABHE's Policy on Alternative Academic Patterns. ABHE will conduct site visits to a representative sample of at least 25% of an institution's additional locations during an accreditation cycle. If students are expected to attend a regular session of a class on an ongoing basis at an off-campus location, that location is considered an additional location if 50% or more of a degree program can be earned through a combination of such courses and traditional face-to-face classes at that location.
- 11. Branch campus.** A branch campus is a geographically separate unit, independent of the main campus, with its own core facilities, curricula, faculty, administrative or supervisory personnel, and instructional resources. It is permanent in nature, offers academic programs leading to a recognized credential, and has its own budgetary and hiring authority. A site visit is required within six months of the establishment of a branch campus. Site visits to all existing branch campuses will be conducted at least once in an accreditation cycle. Guidelines for branch campuses are spelled out in ABHE's Policy on Alternative Academic Patterns. Both the establishment of and discontinuation of a branch campus is a substantive change.

### Principles Relating to Substantive Change

- 1. Institutional autonomy.** The autonomy of each institution will be recognized. The Commission on Accreditation's authority relates only to an institution's accreditation. It cannot prohibit an institution from pursuing a proposed substantive change, but it can impose sanctions or remove accreditation when a substantive change is enacted without proper approval or fails to demonstrate that the change will not adversely affect the capacity of the institution to continue to meet ABHE Standards for Accreditation.
- 2. Innovation.** The Commission on Accreditation wishes to encourage sound innovation and development. The Commission on Accreditation's Policy on Substantive Change is meant to ensure innovation and development through appropriate educational practices, not to stifle new ideas.
- 3. Pace of change.** The Commission on Accreditation recognizes that during a time of rapid change, an institution may experience weakened compliance with the standards for accreditation. When multiple changes are compounded, they may require a new comprehensive evaluation of the institution. A comprehensive evaluation requires the submission of self-study documents addressing all of the ABHE standards, an on-site evaluation team visit, and a Commission on Accreditation decision to grant new accreditation encompassing the changes proposed. Changes within a 12-month period that can trigger such a visit will include:

Two of these:

- a. Relocation or merger
- b. Change in legal status, form of control, or ownership
- c. Financial stress as indicated by a financial stability composite score below 1.0

And two of these:

- a. Programs that are a significant departure from previous offerings
- b. Programs at a different level than previous offerings
- c. Initial offering of the first degree program(s) where 50% or more of the program is available via a new modality
- d. Initiation of an additional location or branch campus

### Procedure for Gaining Approval of Substantive Change

1. A candidate or accredited institution should, at least 6 months prior to implementation, notify the Director, Commission on Accreditation, in writing, of any contemplated change that may be substantive. The Director will provide guidance concerning substantive changes which require a proposal and Commission on Accreditation approval before implementation and other changes which may require only notification and description of the change, but not prior approval of the Commission on Accreditation before implementation. Should an institution disagree with the Director's determination as to the nature of the change, the matter will be referred to the Committee on Progress Reports and Substantive Change (accredited institutions) or the Committee on Applicant and Candidate Status (candidate institutions) for a decision.
2. Substantive change proposals must be submitted electronically and adhere to the submission and format instructions in the ABHE Report Guide (available at [forms.abhecoa.org](http://forms.abhecoa.org)). Substantive change proposals should follow the format in the Substantive Change Form also available at [forms.abhecoa.org](http://forms.abhecoa.org). Substantive changes are considered by the Commission on Accreditation on the following schedule:

Proposal Received by	Commission on Accreditation Decision by
May 15	July 31
Sept. 15	Nov. 30
Dec. 15	Feb. 28

3. The institution is responsible to provide thorough documentation relating to the proposed substantive change. Such documentation must include, as a minimum, the purpose and rationale for the change in reference to the institutional mission and educational goals; evidence/findings of a careful assessment of the need and/or demand for the change; a comprehensive description of the change; responsible estimates of required resources (e.g., facilities, personnel, finances, learning resources, information technology, infrastructure); a plan for procurement and/or allocation of needed resources; any structural alterations necessary for implementation of the change; evidence of due consideration and authorization of the change through appropriate channels of institutional governance; the anticipated impact of the change upon institutional stability, and the effective date of the change (which cannot be retroactive). The proposal should also address fully the elements and provisions of applicable policies related to ABHE criteria, as noted above for various types of substantive changes. When the change involves a new location or new degrees, proof of governmental authorization, if applicable, is required.

4. Substantive changes must not be implemented by an institution until approval is received from the Commission on Accreditation. The Commission on Accreditation may approve the change, disapprove the change, or defer a decision pending the receipt of additional documentation.
  - a. Approval of a substantive change is an indication that implementation is not likely to jeopardize the institution's accreditation. At the Commission on Accreditation's option, it may (1) require no follow-up activity until the institution's next scheduled reaffirmation, (2) require the submission of a progress report after a specified period of time, (3) request that the institution host the Director, Commission on Accreditation or his representative for an on-site evaluation after a specified period of time, or (4) request that the institution host an evaluation team visit after a specified period of time.
  - b. Disapproval of a substantive change is an indication that implementation will likely jeopardize the institution's accreditation.
5. Approval will not be granted for any substantive change that adversely affects the capacity of the institution to continue meeting the Standards. Approval is required before implementation of a substantive change, and the effective date of the inclusion of the change within the institution's scope of accreditation is the date on which the Commission on Accreditation approves the substantive change. Retroactive approvals will not be granted.
6. Should an institution proceed with implementation of a substantive change after receiving disapproval from the Commission on Accreditation, a show cause order will automatically be issued.
7. An approved substantive change that has not been implemented within two years must be updated and resubmitted to the Commission on Accreditation for consideration.
8. Non-substantive changes which require notification may be implemented at the discretion of the institution upon notification to the Director, Commission on Accreditation. The Commission on Accreditation reserves the right to require additional documentation or a subsequent progress report on the change at its discretion.

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