

Policy on Substantive Change

Changes Requiring a Proposal and Commission on Accreditation (COA) Approval Before 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.¹
- d. Discontinuation of all graduate level offerings or all undergraduate level offerings (requires submission of a teach-out plan for affected students).²
- 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.³
- 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.⁴
- i. Addition of a permanent location at which the institution is conducting a teach-out.²

¹See the Policy on Biblical and Theological Studies.

²See the Policy on Teach-Out Plans.

³See the Policy on Adult Degree Completion Programs.

⁴See the Policy and Procedures for Branch Campuses and Additional Locations.

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 implementation).
- c. Change in legal status, form of control, or ownership (requires a site visit within 6 months of implementation).

4. Change in Geographical Location

- a. Relocation of main campus (requires a site visit within 6 months of implementation).¹
- 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).^{1,2}
- c. Initiation or relocation of a branch campus (requires a site visit within 6 months of implementation).¹

- 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).^{1,3}
- e. Initiation of a pre-approval waiver for additional locations beyond three. See the Policy and Procedures for Branch Campuses and Additional Locations for additional requirements.¹

¹See the Policy and Procedures for Branch Campuses and Additional Locations.

²See the Policy on Alternative Academic Patterns.

³See the Policy on Teach-Out Plans.

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.¹
- b. Initial offering of the first competency-based education program at an institution by the course/credit approach.²
- c. Initial offering of the first competency-based education program by a direct assessment or hybrid approach.²
- d. Offering a competency-based education program beyond the first by direct assessment.²
- e. Offering a competency-based education program beyond the first where 50% or more of the program will be available by the hybrid approach.²

¹See the Policy on Alternative Academic Patterns.

²See the Policy on Competency Based Education.

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 COA 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).¹
- 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.¹

¹See the Policy on Alternative Academic Patterns.

When an institution is uncertain if a change is substantive or not, the COA Director should normally be consulted at least 6 months before implementation. Should an institution disagree with the Director's determination as to the nature of the change (substantive or non-substantive), the matter will be referred to the respective COA review committee for a decision.

The institution is expected to review its Accreditation Fact Sheet in the ABHE Online Directory periodically and notify the COA staff of any changes. Such information includes accreditation status, approved

programs, delivery modes, and all off-campus instructional locations. The institution is expected to verify Fact Sheet information at least once per year.

Clarifications

- 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).
- 2. 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. Modality (distance, hybrid, correspondence, competency-based education).** This term refers to the way in which courses are primarily delivered as defined in the Policy on Alternative Academic Patterns.

Pace of Change

The COA 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 COA decision to grant new accreditation encompassing the changes proposed. Changes within a 12-month period that can trigger such a visit will include any of the following combinations:

Two of these:

- Relocation or merger
- Change in legal status, form of control, or ownership
- Financial stress as indicated by a Financial Responsibility Composite Score (FRCS) below 1.0

Plus two of these:

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

Procedure for Gaining Approval of Substantive Change

1. Substantive change proposals must be submitted electronically to coa@abhe.org and adhere to the submission and format instructions in the ABHE Report Guide (available at forms.abhecoa.org). Substantive change proposals should follow the Substantive Change Form template also available at forms.abhecoa.org. The substantive change fee is due upon submission of a substantive change proposal. Substantive changes are considered by the COA on the following schedule:

Proposal Received by	COA Decision by
May 15	July 31
Sept. 15	Nov. 30
Dec. 15	Feb. 28

Substantive changes for accredited institutions are reviewed by the Committee on Progress Reports and Substantive Change (PRSC), and for candidate institutions by the Committee on Applicant and Candidate Status (APCAN). Substantive changes must be approved by the COA. Note that applicant institutions report changes through their annual progress report to APCAN rather than submitting substantive change proposals.

2. 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.
3. Substantive changes must not be implemented by an institution until approval is received from the COA. The COA 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 COA'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, COA, 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.

4. 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 COA approves the substantive change. Retroactive approvals will not be granted. An institution that implements a substantive change without approval may be subject to COA sanction, including a show cause order.
5. Should an institution proceed with implementation of a substantive change after receiving disapproval from the COA, a show cause order will automatically be issued.
6. An approved substantive change that has not been implemented within two years must be updated and resubmitted to the COA for consideration.

Changes Requiring a Site Visit

Establishing or relocating a main campus, branch campus, or additional location requires a visit by a representative of the COA staff within six months after implementation of the change. Visits are also required to all branch campuses and a representative sample of additional locations during the three years before a COA decision on reaffirmation of accreditation. See the Policy and Procedures for Branch Campuses and Additional Locations for further information.

Items for review when establishing an additional location or branch campus are provided in the Policy and Procedures for Additional Locations and Branch Campuses. Items for review when relocating a main campus, additional location, or branch campus are below. The institution should prepare written responses to the following queries for the evaluator's consideration at the relocation visit.

1. To what extent are the facilities, resources, and services consistent with the information in the approved Substantive Change Request? Discuss any changes since implementation from the plan described in the Substantive Change Request.
2. Are there any courses or programs now offered at the new campus that were not offered on the old campus? If yes, discuss how these are congruent with the mission of the institution.
3. Provide a complete faculty roster documenting what courses have been offered on the new campus since relocation, the instructor teaching each course, and the documented expertise the faculty member has in the area of course content. Discuss and provide evidence that any faculty members qualified by means other than academic credential have the appropriate expertise for the subjects they teach.
4. Discuss and provide evidence that the services provided to students at the new campus location are appropriate to the need.
5. Discuss and provide evidence that the instructional facilities and instructional technology at the new campus location are adequate for the degrees/programs offered as well as the delivery modality employed?

The COA may require a COA staff visit where clarifications are needed concerning other substantive changes prior to approval as well.

Revised October 1986, 1990, 1992, February 1995, October 1997; February 2000, February 2007, November 2007, February 2009, February 2010, November 2011, April 2012, November 2012, February 2013, February 2015, June 2016, February 2017, February 2019