

Policy on Substantive Change

Changes Requiring a Proposal and Commission on Accreditation (COA) or Substantive Change Officer Approval before Implementation

1. Change in Mission or Objectives

- a. Any substantial change in the established mission or objectives of the institution or its programs.

2. Change in Scope

- a. Addition of graduate/post-graduate programs by an institution that previously offered only undergraduate degrees or certificates.
- b. Addition of doctoral programs by an institution that previously offered only master's degrees or graduate certificates.
- c. Addition of programs that represent a significant departure from existing programs offered at the time of the last comprehensive review. A significant departure exists when a new educational program (major, concentration, or certificate of 24 semester hours/36 quarter hours or more) requires 12 semester hours (18 quarter hours) or more of coursework in a discipline not reflected in previously approved programs. Required coursework in an already approved program offered over the past three years is not considered part of the 12 semester hours in a new discipline for the purpose of determining significant departure.
- d. Introduction of an alternative Bible/Theology Studies requirement where 50% or more of the requirement is met through means other than Biblical Studies and/or Theological Studies courses.¹
- e. Entering into a written arrangement under which an institution or organization not certified to participate in the Title IV, Higher Education Act (HEA) programs offers more than 25% and up to 50% of one or more of the accredited institution's educational programs. (The institution issuing the credential must offer more than 50% of the degree or certificate.) This does not apply to transfer articulation agreements.
- f. Initiation of an adult degree completion program.³
- g. A change in the way an institution measures student progress, including whether the institution measures progress in clock hours or credit hours, semesters, trimesters, or quarters, or uses time-based or non-time-based methods.
- h. A substantial increase in the number of clock hours or credit hours awarded, or an increase in the level of credential awarded, for successful completion of a program.
- i. Acquisition of another institution, or program or location of another institution.⁴
- j. Addition of a permanent location at which the institution is conducting a teach-out for students of another institution that has ceased operating before all students have completed their program of study.^{2,4}

¹[See the Policy on Biblical and Theological Studies.](#)

²[See 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 or 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 the 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, which may be submitted along with the substantive change proposal for a third additional location. 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/Delivery Method

- a. Addition of the first program where a student may complete 50% or more of a program via a delivery method not in use (at the 50% level) at the time of the last comprehensive review. Applicable to distance education, hybrid (distance/face-to-face), correspondence education, and competency-based education by the course/credit approach.^{1,2}
- b. Addition of each competency-based education program where 50% or more of the program will be available by direct assessment.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 the last three academic years, or Provisional Certification for Title IV, HEA Programs

In addition to the substantive changes noted above, institutions on warning, probation, or show cause, currently or at any time in the last three academic years, must treat the following as substantive changes. Institutions under Provisional Certification for Title IV, HEA Programs (see 34 CFR 668.13 at <https://gov.ecfr.io>) must also treat the following as substantive changes. Submission of a substantive change proposal and COA or Substantive Change Officer approval are required before implementation.

- a. A change in an existing program's method of delivery.
- b. An aggregate change of 25% or more of the clock hours, credit hours, or content of a program since the last comprehensive review.
- c. The development of customized pathways or abbreviated or modified courses or programs to (1) Accommodate and recognize a student's existing knowledge, such as knowledge attained through employment or military service; and (2) close competency gaps between demonstrated prior knowledge or competency and the full requirements of a particular course or program.
- d. Entering into a written arrangement under which an institution or organization not certified to participate in the Title IV, HEA Programs offers any portion of one or more of the accredited institution's educational programs (see 34 CFR 668.5 at <https://gov.ecfr.io>). This does not apply to transfer articulation agreements.
- e. Initiation of extension classes in a new location where less than 50% of a degree program may be completed.
- f. First offering of courses using a new modality (e.g., distance, hybrid, correspondence education, or competency-based education).^{1,2}
- g. Each offering of programs where 50% or more of an academic program may be completed by distance education (online), hybrid, correspondence education, or competency-based education by the course/credit approach.^{1,2}

¹[See the Policy on Alternative Academic Patterns.](#)

²[See the Policy on Competency Based Education.](#)

7. Notification Requirements

- a. Institutions not on Warning, Probation, Show Cause, or Provisional Certification for Title IV, HEA Programs must report the changes in 6a-d above to the COA office at coa@abhe.org within 30 days or be subject to COA action.
- b. Initiation of an additional location under a pre-approval waiver must also be reported to the COA office within 30 days, along with the required documentation (see the Policy on Branch Campuses and Additional Locations).
- c. 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.

8. Changes which May be Acted on by the COA Substantive Change Officer

- a. The COA deputizes a member of the COA professional staff as Substantive Change Officer to approve or disapprove the following changes in a timely, fair, and equitable manner:
 - 2c Addition of programs that represent a significant departure from existing programs
 - 2e Entering into a written arrangement which an institution not certified for Title IV to offer more than 25% and up to 50% of a program
 - 2g A change in the way an institution measures student progress
 - 2h A substantial increase in the number of clock hours or credit hours awarded, or an increase in the level of credential awarded
 - 2j Addition of a permanent location at which the institution is conducting a teach-out
 - 5a Addition of a program where a student may complete 50% or more of the program via a new delivery method

When an institution is uncertain if a change is substantive or not, the COA Substantive Change Officer should be consulted at least 6 months before the intended implementation. Should an institution disagree with Substantive Change Officer's decision, the matter will be referred to the respective COA review committee for a decision at the next scheduled meeting. A final decision concerning 2e (entering into a written arrangement under which an institution not certified for Title IV offers more than 25% and up to 50% of a program) will be made by the Substantive Change Officer within 90 days of submission of an adequately documented request, or if referred to the COA, within 180 days.

9. Pace of Change

1. 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 trigger such a visit include any of the following combinations:

Two of these:

- a. Relocation of the main campus
- b. Merger or change in legal status, form of control, or ownership
- c. Financial stress as indicated by a Financial Responsibility Composite Score (FRCS) below 1.0

Plus two of these:

- a. Addition of programs that are a significant departure from previous offerings
- b. Addition of graduate programs by an institution that previously offered only undergraduate degrees or certificates, or addition of doctoral programs by an institution that previously offered only master's degrees or graduate certificates

- c. 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. 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 abhe.org/accreditation/accreditation-documents). Substantive change proposals should follow the Substantive Change Form template also available at abhe.org/accreditation/accreditation-documents. Since the substantive change form is designed to accommodate a broad range of substantive changes, the COA Substantive Change Officer may waive completion of sections of this form that do not provide meaningful analysis relevant to a specific situation. Institutions should contact the Substantive Change Officer for guidance in completing the form as needed. The substantive change fee is due upon submission of a substantive change proposal. Decisions on substantive changes which may be acted on by the COA Substantive Change Officer will be rendered within 90 days of submission of adequate documentation. Substantive changes that require COA action 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 satisfaction of applicable ABHE policies where appropriate. When the change involves a new location or new degree, proof of

governmental authorization, if applicable, is required. Where accreditation approval is required prior to government authorization, the COA may provide provisional approval with final approval contingent upon government authorization.

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 COA Director 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 COA 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. Willful disregard of a COA decision will result in negative action by the COA.
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 or relocating an additional location or branch campus are provided in the [Policy and Procedures for Branch Campuses and Additional Locations](#). Items for review when relocating a main 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.

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