

## 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 degrees, certificates, or diplomas by an institution that previously offered only undergraduate degrees or certificates.
- b. Addition of doctoral degrees, certificates, or diplomas 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 is defined as either a new educational program (major or concentration) of 24 semester hours/36 quarter hours or more or a credential (degree, certificate, or diploma) that requires 50% of semester hours in a discipline not reflected in previously approved programs or credentials. Required coursework in an already approved program offered over the past three years is not considered part of the 50% of 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.<sup>1</sup>
- 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% but less than 50% of one or more of the accredited institution's degrees, certificates, or diplomas. (The institution issuing the credential must offer 50% or more of the degree or certificate.) This does not apply to transfer articulation agreements.
- f. Initiation of an adult degree completion program.<sup>3</sup>
- 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.<sup>4</sup>
- 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.<sup>2,4</sup>
- k. Participation in the federal Prison Education Program (PEP) providing Pell Grant access to confined on incarcerated students.<sup>5</sup>

<sup>1</sup>See the *Policy on Biblical and Theological Studies*

<sup>2</sup>See the *Policy on Teach-Out Plans*

<sup>3</sup>See the *Policy on Adult Degree Completion Programs*

<sup>4</sup>See the *Policy and Procedures for Educational Sites Geographically Separate from the Main Campus*

<sup>5</sup> See the *Policy and Procedures for Federal Prison Education Programs*

### 3. Change in Control

- a. Initiation/discontinuation of a formal relationship with a denomination or fellowship.
- b. Change in ownership resulting in a change of control. Changes that constitute a “change of ownership resulting in a change of control” include, but are not limited to, merger, acquisition, change in legal status, or change in governance (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).<sup>1</sup>
- b. Initiation or relocation of an additional location where 50% or more of a degree, certificate, or diploma may be earned by classroom courses, hybrid courses, or a combination of both (requires a site visit within 6 months of implementation).<sup>1,2</sup>
- c. Initiation of an educational site at a Federal, State, or local penitentiary, prison, jail, reformatory, work farm, juvenile justice facility, or other similar correctional institution (requires a site visit within 6 months of implementation).<sup>1,2,4</sup>
- d. Addition of the first credential where a student may complete 50% or more at a Federal, State, or local penitentiary, prison, jail, reformatory, work farm, juvenile justice facility, or other correctional institution if not reviewed when site was initiated.<sup>1</sup>
- e. Initiation or relocation of a branch campus (requires a site visit within 6 months of implementation).<sup>1</sup>
- f. Discontinuation of a branch campus or an additional location where 100% of a degree, certificate, or diploma may be earned (requires submission of a teach-out plan for affected students).<sup>1,3</sup>
- g. 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 Educational Sites Geographically Separate from the Main Campus* for additional requirements.<sup>1</sup>

<sup>1</sup>See the *Policy and Procedures for Educational Sites Geographically Separate from the Main Campus*

<sup>2</sup>See the *Policy on Instructional Modalities*

<sup>3</sup>See the *Policy on Teach-Out Plans*

<sup>4</sup> See the *Policy and Procedures for Federal Prison Education Programs (PEPs)*

### 5. Change in Modality/Delivery Method

- a. Addition of the first credential where a student may complete 50% or more via a delivery method not in use (at the 50% level) at the time of the last comprehensive review. Applicable to distance education, correspondence education, mixed modality, and competency-based education by the course/credit approach.<sup>1,2</sup>
- b. Addition of each competency-based education program where 50% or more is completed by direct assessment.<sup>2</sup>
- c. Addition of the first credential where a student may complete 50% or more via a delivery method not in use for an existing federal Prison Education Program (PEP).<sup>1,2,3</sup>

<sup>1</sup>See the *Policy on Instructional Modalities*

<sup>2</sup>See the *Policy on Competency Based Education*

<sup>3</sup>See the *Policy and Procedures for Federal Prison Education Programs (PEPs)*

## 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 degree's, certificate's, or diploma's method of delivery.
- b. An aggregate change of 25% or more of the clock hours, credit hours, or content of a degree, certificate, or diploma 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 degrees, certificates, or diplomas (see 34 CFR 668.5 at <https://gov.ecfr.io>). This does not apply to transfer articulation agreements.
- e. Initiation of an extension site where less than 50% of a degree, certificate or diploma may be completed.
- f. First offering of courses using a new modality (e.g., distance, correspondence education, mixed modality, or competency-based education).<sup>1,2</sup>
- g. Each offering of programs where 50% or more of a degree, certificate, or diploma may be completed by distance education (online), correspondence education, mixed modality, or competency-based education by the course/credit approach.<sup>1,2</sup>

<sup>1</sup>See the *Policy on Instructional Modalities*

<sup>2</sup>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](mailto: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 and Procedures on Educational Sites Geographically Separate from the Main Campus*).
- c. The institution is expected to review its Accreditation Profile 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 Accreditation Profile 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 credentials that represent a significant departure from existing programs
  - 2e Entering into a written arrangement with an institution not certified for Title IV to offer more than 25% but less than 50% of a degree, certificate, or diploma
  - 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 credential where a student may complete 50% or more 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 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% but less than 50% of a degree, certificate, or diploma) 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

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 credentials or programs that are a significant departure from previous offerings
- b. Addition of graduate degrees, certificates, or diplomas by an institution that previously offered only undergraduate degrees or certificates, or addition of doctoral degrees, certificates, or diplomas by an institution that previously offered only master's degrees or graduate certificates
- c. Offering of the first credential or program where 50% or more 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](mailto:coa@abhe.org) and adhere to the submission and format instructions in the ABHE Report Guide (available at [abhe.org/accreditation/accreditation-documents](http://abhe.org/accreditation/accreditation-documents)). Substantive change proposals should follow the Substantive Change Form template also available at [abhe.org/accreditation/accreditation-documents](http://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
September 15	November 30
November 15	March 15

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. Substantive change applications addressing issues of institutional compliance with federal, state, or provincial regulations may be reviewed by the Commission between scheduled meetings. 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 Executive 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, including all federal Prison Education Program (PEP) sites, 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 Educational Sites Geographically Separate from the Main Campus* for further information.

Items for review when establishing or relocating an additional location or branch campus are provided in the *Policy and Procedures for Educational Sites Geographically Separate from the Main Campus*. Items for review when relocating a main campus are below. In preparation for the visit, the institution should prepare and submit written responses for the items below to the CSR at least one week prior to the visit.

1. Provide a current and complete listing of all courses and programs leading to a degree, certificate, or other recognized educational credential offered at the relocated campus. Highlight changes in offerings since the approved Substantive Change Request.
2. Describe any changes in the financial, human, facility, and technological resources that support the relocation since the approved Substantive Change Request. Describe how these resources are adequate to support the current offerings at the relocated campus.
3. Describe any changes in the library and learning resources made available to students studying at the relocated campus since the approved Substantive Change Request. How are these resources adequate for the educational offerings delivered through this location?
4. Describe any changes in the student services provided at the relocation since the approved Substantive Change Request. How are these services adequate for the educational offerings delivered through this location?
5. Provide a complete faculty roster for the relocated campus since its inception with courses taught and evidence of appropriate faculty qualifications.
6. Discuss and provide evidence for any changes in authorization to operate at this location or to offer the credentials that the institution makes available to students through this location since the approved Substantive Change Request.
7. Provide evidence that the relocated campus has adequate administrative personnel.

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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