

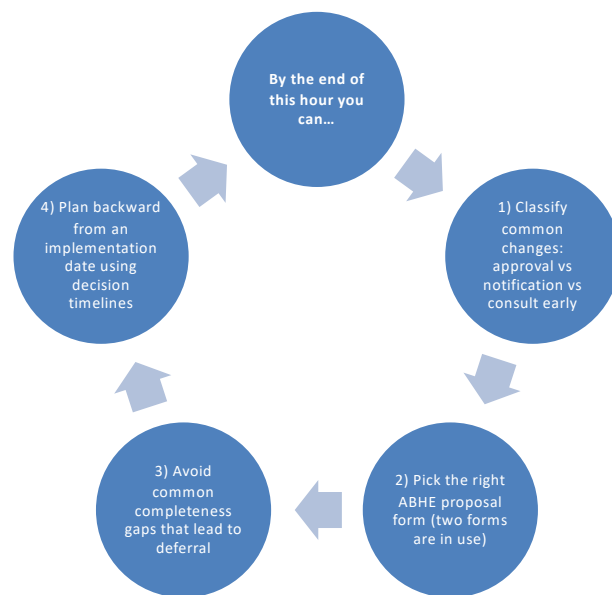
Substantive Change: Understanding the Policy and Related Procedures

ABHE Annual Meeting

Presenter: Michael Jackson, Associate Director | ABHE
Commission on Accreditation

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Today's
outcomes (and
how we'll get
there)



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Start here:
the rule
that
protects
you

The non-negotiables

- Substantive changes require COA or Substantive Change Officer approval BEFORE implementation.
- Retroactive approvals are not granted. Implementing without approval can lead to sanction.
- If you are unsure whether a change is substantive, consult the Substantive Change Officer early (policy expectation: at least 6 months).
- Other changes may be implemented at the institution's discretion but require notification.

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A repeatable
workflow for
liaisons

Decision workflow (use this every time)

- Step 1 — Describe the change in one sentence (what, where, who, when).
- Step 2 — Find the change type in the Substantive Change policy list. If it's listed → approval required.
- Step 3 — Is it a NEW program/credential? If yes, use the Program Addition proposal form. If not, use the other proposal form.
- Step 4 — If the change type is in Required Notifications → notify within 30 days of implementation.
- Step 5 — If gray/uncertain → consult the Substantive Change Officer at least 6 months before implementation.
- Step 6 — Plan backward from implementation date using decision timelines and internal governance approvals.

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Two ABHE proposal forms (do not submit the PDF versions)

Form 1: Program Addition

Use when proposing:

- 2a: first graduate/post-grad credentials (if previously only undergrad)
- 2b: first doctoral credentials (focused visit required)
- 2c: significant departure (new discipline)
- 2h/2i: competency-based education thresholds (50%+)
- 2j: adult degree completion program

Online submission (scan QR):



Form 2: All Other Change Types

Use for everything else (examples):

- 4b: additional location where 50%+ can be earned face-to-face/hybrid
- 5b: reaching 50% distance education threshold (3 triggers)
- Change in control/ownership, main campus relocation, etc.

Online submission (scan QR):

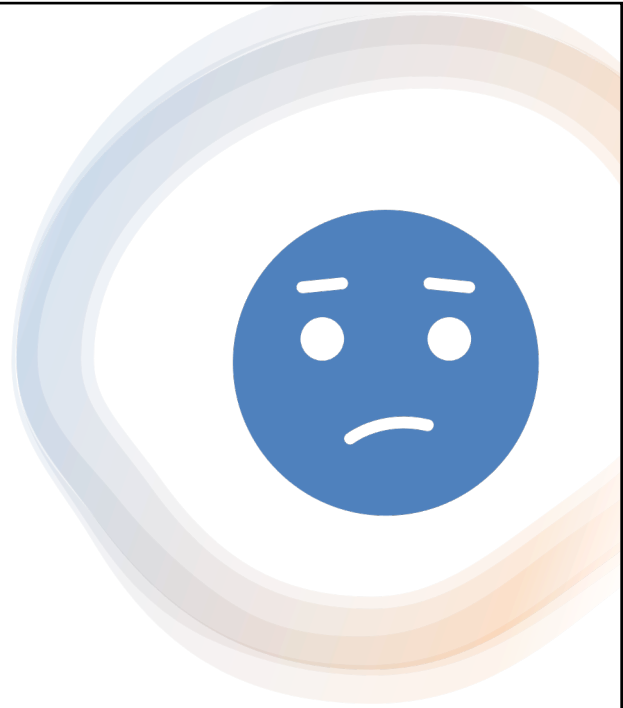


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New program decisions: keep it simple

New programs + “significant departure” (common pain point)

- A ‘significant departure’ can be triggered:
 - A new major/concentration of 24 semester hours / 36 quarter hours or more
 - OR a credential
 - where 50% of semester hours are in a discipline not reflected in previously approved programs/credentials
- Tip: coursework already in an approved program required over the past 3 years is NOT counted toward the 50% in a new discipline test.
- If you’re close to the line, consult early—don’t guess.



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Locations: additional location vs extension site

Additional locations: the 50% threshold you must get right

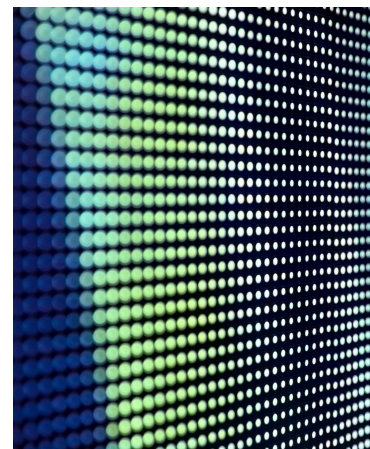
- Substantive change approval is required for initiating/relocating an additional location where 50% or more of a credential may be earned by face-to-face, hybrid, or a combination.
- If it is an extension site where less than 50% may be completed, it is typically handled as a Required Notification (plus profile updates).
- Establishing/relocating a main campus, branch campus, or additional location requires a COA staff visit within 6 months after implementation.
- Pre-approval waiver: initiation of an additional location under an approved waiver is a notification-only action, with required evidence within 30 days.

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Activity: practice the workflow

Rapid Sort (Case Studies)

- For each case, decide:
 - 1) Approval Needed, Notification Needed, or Consultation Needed?
 - 2) Which ABHE form (if approval)?
 - 3) One document you would NOT forget to attach.
- Voting: hold up 1 finger = Approval | 2 fingers = Notification | 3 fingers = Consult



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Case A

Case A — New program

- Your institution has only offered undergraduate degrees.
- You plan to launch a 36-credit Master's program (Fall 2027).
- Mostly new courses; recruiting will begin in 6 months.
- Questions:
 - Approval/Notification/Consult?
 - Which form?
 - What timing risk do you see?

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Case B

Case B — Additional location vs extension site

- You plan a new site in another city in another state.
- Students could complete 60% of a BA at the site through face-to-face/hybrid courses.
- Same catalog, but you will hire 2 adjuncts locally.
- Now, twist: what if students could only complete 24% of the BA at the site?
- Questions: For each version, what pathway applies and what do you do next?
 - Approval/Notification/Consult?
 - Which form?
 - What documentation would be important to include?

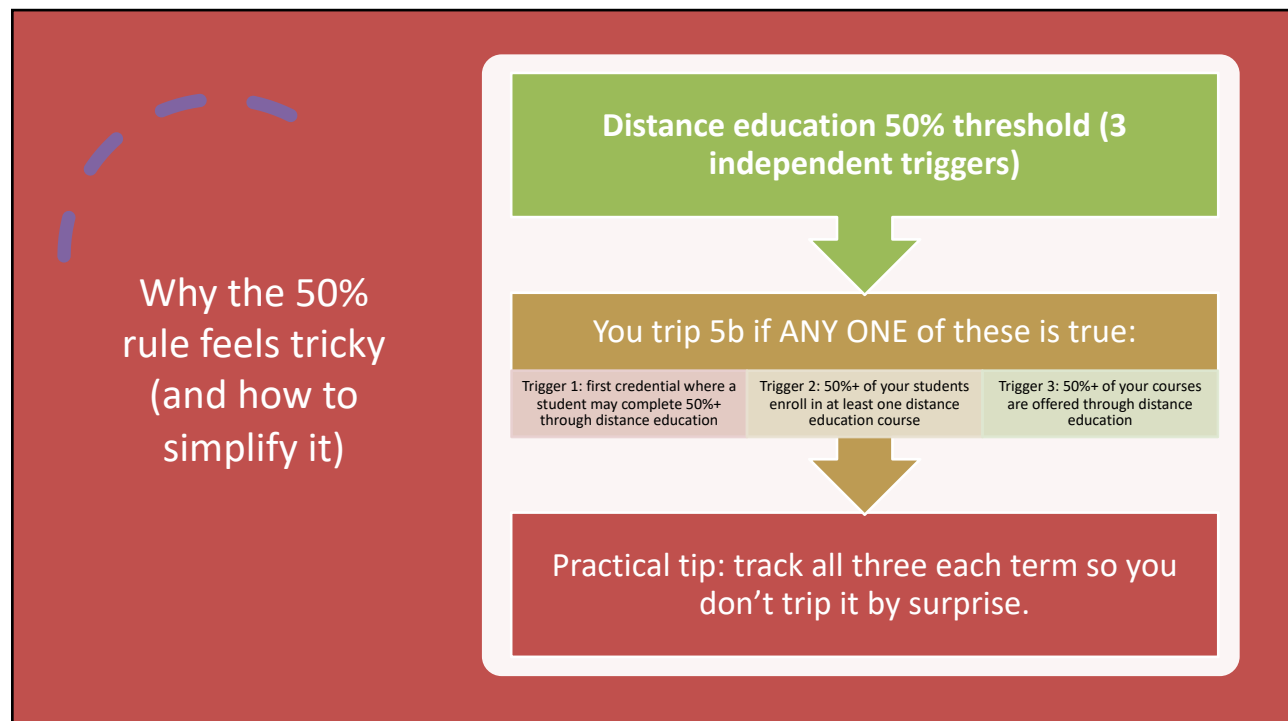
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Case C

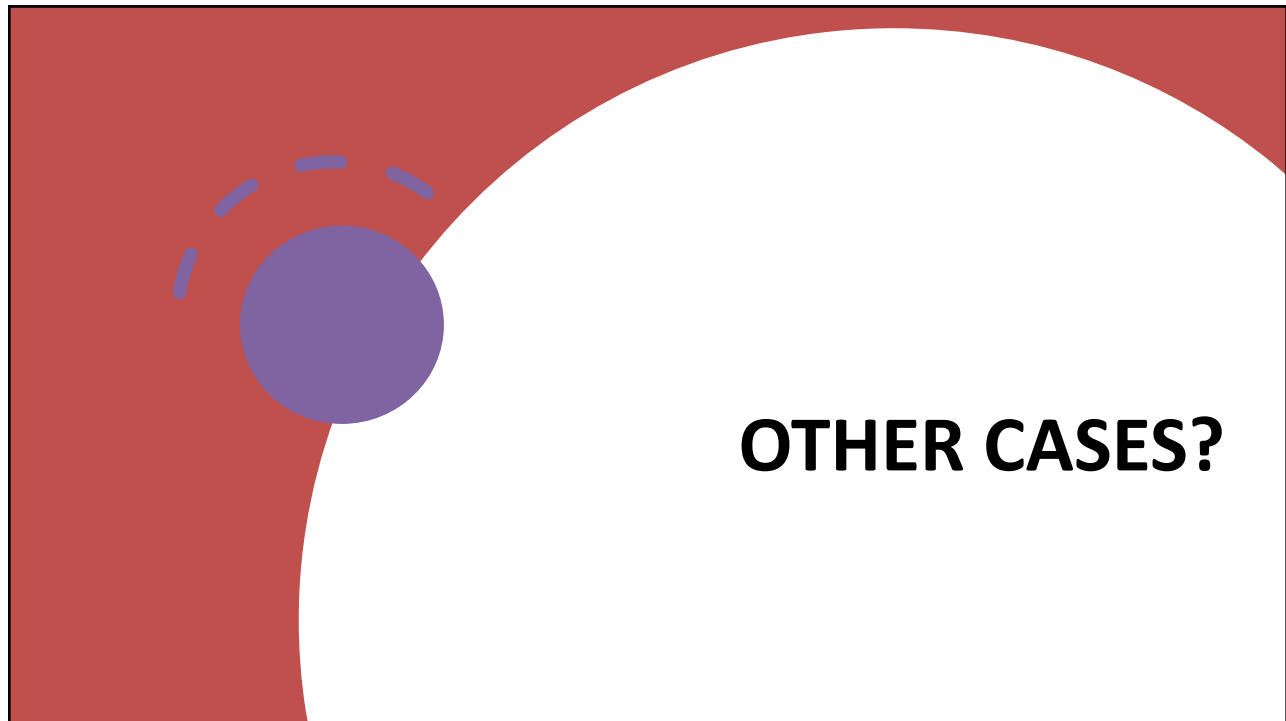
Case C — The 50% distance education threshold

- Scenario: your catalog programs remain mostly face-to-face.
- Only 40% of courses are offered by distance education.
- 55% of your students enroll in at least one distance education course this term.
- Questions:
 - Does this trigger substantive change approval?
 - Which trigger?
 - Which form?

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Completeness: the easiest way to avoid deferral

Proposal packet checklist (what reviewers need to see)

- Purpose + rationale tied to mission and educational goals
- Need/demand analysis (what evidence supports doing this now?)
- Comprehensive description of the change (what will actually happen)
- Resource plan: facilities, personnel (include faculty details!), finances, learning resources (explain these in detail!), IT/infrastructure
- Governance authorization: show the internal approvals are complete BEFORE submission
- Impact on institutional stability + accurate effective date (not retroactive)
- Authorizations: state/provincial and other external approvals when applicable
- **DON'T FORGET TO INCLUDE THE CURRICULUM** (for program related changes)!
- Assessment Plan
- Revenue and Direct/Indirect Expenses for 3 Years

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Timing: a simple way to avoid ‘we already started...’

Timeline planning (work backward from the desired launch)

- If COA action is required, proposals are considered on this schedule:
 - Received by May 15 → COA decision by July 31
 - Received by Sept 15 → COA decision by Nov 30
 - Received by Nov 15 → COA decision by Mar 15
- Some change types may be acted on by the Substantive Change Officer with decisions within 90 days of adequate documentation.
- Policy expectation: consult at least 6 months before intended implementation when uncertain.

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Required Notifications

Required Notifications (how-to)

- When a change is listed in Required Notifications, notify COA within 30 days of implementation (unless your institution is in a special status category).
- For modality notifications: include every degree affected, the new modality (50%+ in a new modality), and the effective date.
- Format: letter on institutional letterhead, signed by the Accreditation Liaison or President; email to coa@abhe.org.
- For extension sites / location profile changes: update Weave and include addresses, rationale, and state/provincial approval evidence.
- For pre-approval waiver locations: within 30 days, submit the required evidence (academic control, comparability systems, resources, financial stability, planning, program list).

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Substantive Change Checklist

- 1) One-sentence change description (what/where/when) and determine if substantive
- 2) New program/credential? → Program Addition proposal form
- 3) Not a new program? → Find the policy trigger → All Other Change Types form
- 4) If it's a Required Notification → notify within 30 days + update profile as required
- 5) Build a complete proposal: mission fit + demand + description + resources + governance approvals + authorizations
- 6) Plan backward from the decision timeline; consult early when uncertain (aim 6 months)



Program Addition Form



All Other Changes Form



Weave Profile for Required Notifications

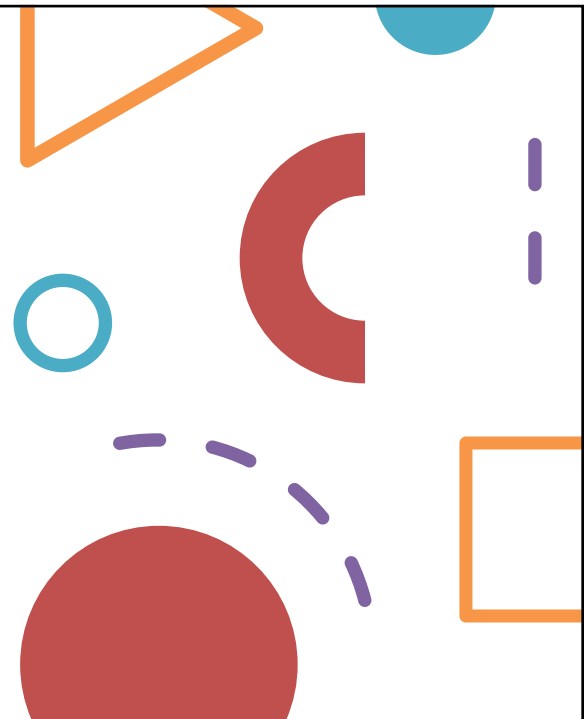


Add Degree (Required Notifications)

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MAJOR EXCEPTION

- **Institutions on Warning, Probation, or Show Cause in the last three academic years, or Provisional Certification for Title IV, HEA Programs**



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

- 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 or programs that represent a significant departure from existing programs
- 2e. Entering into a written arrangement under which an institution or organization not certified for Title IV offers more than 25% but less than 50% of a degree, certificate, or diploma
- 2h. Addition of the first credential where a student may complete 50% or more through competency-based education by the course-credit approach
- 2k. A change in the way an institution measures student progress
- 2l. A substantial increase in the number of clock hours or credit hours awarded, or an increase in the level of credential awarded
- 2n. Addition of a permanent location at which the institution is conducting a teach-out
- 5b. Reaching the 50% threshold for distance education
- 5c. Addition of the first credential where a student may complete 50% or more through face-to-face, mixed modality, or correspondence education

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RARE BUT IMPORTANT

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 ABHE standards, an on-site evaluation team visit, and a COA decision to grant new accreditation encompassing the changes proposed.

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