

Policy on Substantive Change and Required Notifications

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A substantive change significantly alters an institution's objectives, scope, control, or geographical location for instruction. Substantive changes require Commission on Accreditation or Substantive Change Officer review and approval prior to implementation. Other institutional changes require notification but may be implemented at the discretion of the institution (see the Required Notifications section below).

1. Change in Mission or Intended Outcomes

- 1a. Any substantial change in the established mission or intended outcomes of the institution or its programs.

2. Change in Scope

- 2a. Addition of graduate/post-graduate degrees, certificates, or diplomas by an institution that previously offered only undergraduate degrees or certificates.
- 2b. Addition of doctoral degrees, certificates, or diplomas by an institution that previously offered only master's degrees or graduate certificates (requires a focused visit for approval).
- 2c. Addition of credentials or 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.
- 2d. 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
- 2e. 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.

- 2f. Entering into a written arrangement under which another accredited institution or consortium of accredited institutions offers more than 25% but less than 50% of one or more of the institution's degrees, certificates, or diplomas. This does not apply to transfer articulation agreements.
- 2g. First offering of competency-based education courses up to 49% of a program.⁶
- 2h. Addition of the first credential where a student may complete 50% or more by competency-based education in the course-credit approach.⁶
- 2i. Addition of each competency-based education program where 50% or more is completed by direct assessment.⁶
- 2j. Initiation of an adult degree completion program.³
- 2k. 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.
- 2l. 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.
- 2m. Acquisition of another institution, or program or location of another institution.⁴
- 2n. 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}
- 2o. Participation in the federal Prison Education Program (PEP) providing Pell Grant access to confined or incarcerated students (requires a site visit within one year of implementation).⁵

2p. Addition of an innovative program⁷

¹See the *Policy on Biblical and Theological Studies*

²See the *Policy on Teach-Out Plans and Teach-Out Agreements*

³See the *Policy on Adult Degree Completion Programs*

⁴See the *Policy and Procedures for Educational Sites Geographically Separate from the Main Campus*

⁵ See the *Policy and Procedures for Federal Prison Education Programs (PEPs)*

⁶See the *Policy on Competency-Based Education and Direct Assessment*

⁷See the *Policy on Innovative Programs*

3. Change in Control

- 3a. Initiation/discontinuation of a formal relationship with a denomination or fellowship.
- 3b. Change in ownership. Changes that constitute a change of ownership 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).
- 3c. Entering into a joint venture (i.e., shared operations and/or programs partnership) with another accredited institution.

4. Change in Geographical Location

- 4a. Relocation of the main campus (requires a site visit within 6 months of implementation).¹
- 4b. Initiation or relocation of an additional location where 50% or more of a degree, certificate, or diploma may be earned by face-to-face courses, hybrid courses, or a combination of both (requires a site visit within 6 months of implementation).^{1, 2}
- 4c. 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).^{1, 2, 4}
- 4d. 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.¹
- 4e. Initiation or relocation of a branch campus (requires a site visit within 6 months of implementation).¹
- 4f. 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 and, if practicable, a teach-out agreement for affected students).^{1, 3}
- 4g. 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.¹

¹See the *Policy and Procedures for Educational Sites Geographically Separate from the Main Campus*

²See the *Policy on Instructional Modalities*

³See the *Policy on Teach-Out Plans and Teach-Out Agreements*

⁴ See the *Policy and Procedures for Federal Prison Education Programs (PEPs)*

5. Change in Instructional Modality

- 5a. First offering of courses using a new instructional modality (e.g., face-to-face, distance education, correspondence education, or mixed modality) up to 49% of a program.¹
- 5b. Reaching the 50% threshold for distance education¹ evidenced by one of the following triggers:
 - i. Addition of the first credential where a student may complete 50% or more through distance education
 - ii. Enrollment of 50% or more of the institution's students in distance education. A student is considered "enrolled in distance education" if he or she enrolls in at least one course offered through distance education.
 - iii. Offering 50% or more of the institution's courses through 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. ¹

- 5d. 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).¹

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¹See the *Policy on Instructional Modalities*

² See the *Policy and Procedures for Federal Prison Education Programs (PEPs)*

6. Institution Closure

- 6a. Planned closure of the institution with at least six months' notice.¹
- 6b. Unplanned closure within six months.¹ (Failure to provide at least six months' notice of closure to the Commission and to constituents is considered an unplanned closure and may result in negative or adverse Commission action.)

¹See *Considerations When Closing an Institution of Higher Education*

7. 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 approval are required before implementation.

- 7a. A change in an existing degree's, certificate's, or diploma's method of delivery.
- 7b. 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.
- 7c. 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.
- 7d. 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.
- 7e. Submission of an application to the U.S. Department of Education to change Title IV gatekeeper.
- 7f. Initiation of an extension site where less than 50% of a degree, certificate or diploma may be completed.
- 7g. 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.^{1, 2}

¹See the *Policy on Instructional Modalities*

²See the *Policy on Competency-Based Education and Direct Assessment*

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

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 the Substantive Change Officer's decision, the matter will be referred to the Substantive Change 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.

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. Changes within a 12-month period that trigger such a visit include any of the following combinations:

Two of these:

- 3b. Change in ownership. Changes that constitute a change of ownership include, but are not limited to, merger, acquisition, change in legal status, or change in governance
- 4a. Relocation of the main campus

Financial stress as indicated by a Financial Responsibility Composite Score (FRCS) below 1.0

Plus two of these:

- 2a. 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
- 2b. Addition of doctoral degrees, certificates, or diplomas by an institution that previously offered only master's degrees or graduate certificates
- 2c. Addition of credentials or programs that are a significant departure from previous offerings
- 4b. Initiation of an additional location
- 4e. Initiation of a branch campus
- 5b. Reaching the 50% threshold for distance education

Procedure for Gaining Approval of Substantive Change

1. Substantive change proposals must be submitted electronically using the forms and links provided abhe.org/accreditation/accreditation-documents under the Substantive Change tab. Substantive change proposals should follow the Substantive Change Form templates also available at abhe.org/accreditation/accreditation-documents (see instructions). 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 and candidate institutions are reviewed by the Substantive Change Committee. 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 the Commission rather than submitting substantive change proposals.

2. The institution is responsible for providing 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. When the change involves relocation of the main campus, temporary authorization for courses to be held at the new location may be given by the COA Executive Director until such time as the Commission can meet and act officially on the relocation.
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/her 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 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.

REQUIRED NOTIFICATIONS

Changes Requiring Commission Notification within 30 days of Implementation

Not applicable to institutions on Warning, Probation, Show Cause, or Provisional Certification for Title IV, HEA Programs. (See Substantive Changes for Institutions on Warning, Probation, or Show Cause in the last three academic years, or Provisional Certification for Title IV, HEA Programs above.)

1. A change in an existing degree's, certificate's, or diploma's method of delivery. ¹
2. 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.
3. 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; (2) close competency gaps between demonstrated prior knowledge or competency and the full requirements of a particular course or program. ²
4. 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.
5. Submission of an application to the U.S. Department of Education to change the Title IV gatekeeper.
6. Initiation of an extension site where less than 50% of a degree, certificate or diploma may be completed.
7. Initiation of an additional location under a pre-approval waiver.³
8. Discontinuation of a branch campus, ~~or an~~ additional location, or extension site where less than 100% of a degree, certificate, or diploma may be earned.³
9. Addition of a degree, certificate, or diploma not considered a Change in Scope.
10. Closure of a degree, certificate, or diploma program.
11. Degree, certificate, or diploma nomenclature change
12. Institution name change

Institutions are expected to periodically review the Accreditation Profile in the ABHE Online Directory and notify COA staff of changes. Such information includes accreditation status, approved programs, delivery modes, and all off-campus instructional locations. Institutions are required to verify Accreditation Profile information at least once per year.

¹See the *Policy on Instructional Modalities*

²See the *Policy on Competency-Based Education and Direct Assessment*

³See the *Policy and Procedures on Educational Sites Geographically Separate from the Main Campus*