

## Policy on Substantive Change

*(Adopted October 1972; Revised January 1978, June 1991, June 1996; Edited October 1997;  
Revised January 2002; Edited June 2002, August 2004; Revised June 2011;  
Edited June 2012, August 2012; Revised June 2013, Revised October 2013)*

### Background

The U.S. Department of Education regulations require that accrediting agencies have adequate policies and procedures to ensure that any substantive changes to the educational mission, or programs of an institution, maintain the capacity of the institution to continue to meet Accreditation Standards. Membership of the Substantive Change Committee is set forth in the ACCJC Bylaws and represents the composition of academic and administrative personnel, *and of public representatives*, required of decision-making bodies by the U.S. Department of Education.<sup>1</sup> *In addition, educators with specialized expertise may be invited to serve as expert advisors to the committee to facilitate consideration of substantive change applications involving programs or single-purpose institutions that prepare students for a specific profession.*

Federal law mandates that accrediting agencies require institutions to obtain accreditor approval of a substantive change before the change is included in the scope of the accreditation granted to the institution. The scope of an institution's accreditation covers all activities conducted in its name.

### Policy

The Commission, through its substantive change process, ensures that institutions continue to meet the Standards. The substantive change process requires evidence of institutional planning, resource commitment to the proposed change, and evidence that following the change the institution continues to meet the Eligibility Requirements, Standards, and Commission policies.

It is the institution's responsibility to demonstrate the effect of a substantive change on the quality, integrity, capacity and effectiveness of the total institution. Substantive changes must be approved by the Commission prior to implementation.<sup>2</sup> *The Committee will not approve a substantive change to be effective on a date prior to its action on the substantive change. The Commission approval of a substantive change proposal will be effective on the date the Substantive Change Committee votes affirmatively to approve the change.*

The Commission publishes a *Substantive Change Manual* that describes the approval process. The institution's accreditation will be extended to areas affected by the change upon review and approval by the Commission. Major substantive changes or the area potentially affected by the substantive change may cause the Commission to decide whether an educational

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<sup>1</sup> 34 C.F.R. § 602.15(a)(3). ~~*In addition, educators with specialized expertise may also be represented on the committee to facilitate consideration of substantive change applications involving programs or single-purpose institutions that prepare students for a specific profession.*~~

<sup>2</sup> 34 C.F.R. § 602.22.

quality and institutional effectiveness review (formerly comprehensive review) or site visit is required to make a determination regarding the substantive change<sup>3</sup>. Situations which may trigger this determination include:

- change of ownership/control/legal status during reaffirmation of accreditation or candidacy status;
- complete or significant change in mission and/or a significant change of mission sought within two years of a change of ownership and change of control;
- any relocation coupled with a change of mission;
- a change of classification from an ~~branch off-site location campus~~ to a *stand-alone institution main-campus*;
- significant departure from meeting the Eligibility Requirements (ERs), Accreditation Standards and/or Commission policies;
- a site visit, special visit or special report that indicates noncompliance with the ERs, Accreditation Standards or Commission policies;
- evidence of unethical practices;
- student indebtedness compared to program, job market, and salary;
- poor student graduation rates, program quality, performance and/or program outcomes;
- *closure of a program or institution due to loss of state authorization or licensing*;
- lack of effective educational policies and practices;
- *rapid growth in the number of sites where more than 50% of an educational program is offered*;
- any change that results in the transition to a 100% distance education institution; or
- other circumstances and the accumulation of changes wherein the Commission concludes the institution, to which it granted accreditation, has effectively ceased to operate under the conditions upon which that grant of accreditation was based.

Institutions may not submit a Substantive Change Proposal in the six-month period preceding the site visit. The Commission may defer consideration of a substantive change request if an institution is on a sanction such as Warning, Probation, or Show Cause until the conditions that caused the Commission to defer a decision or to impose a sanction have been resolved and the Commission has reaffirmed accreditation.

Substantive Changes include, but are not limited to, the following:

### **Change in Mission, Objectives, Scope, or Name of the Institution**

- a change in the mission or character of the institution; if the mission or character of

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<sup>3</sup> 34 C.F.R. § 602.22(a)(3) *Comprehensive evaluations triggered by a major substantive change will proceed in the same manner as a regularly scheduled comprehensive evaluation, with an institutional self evaluation report, external evaluation and report, and action by the Commission on the accredited status of the institution.*

the institution becomes dramatically different, the Commission reserves the right to require the institution to complete the eligibility, candidacy, and initial accreditation process

- a change in the degree level from that which was previously offered by the institution, i.e., offering a degree at a level higher than the accredited institution offers currently
- any change in the official name of the institution
- a merger of two separately-accredited ACCJC institutions into a single accreditable institution
- a reduction of programs to an extent that the institution's mission cannot be accomplished

### Change in the Nature of the Constituency Served

- a change in the intended student population
- closure of an institution *or loss of state authorization or licensure for the institution or a program*<sup>4</sup>
- closure of a location geographically apart from the main campus at which students can complete at least 50% of an educational program
- courses or programs offered outside the geographic region currently served

### Change in the Location or Geographic Area Served

An institution that moves to a new location or opens a new location geographically apart from the main campus where students can complete 50% or more of a program constitutes a substantive change. The Commission will determine if an institution applying for substantive change for a new location requires a site visit. The Commission will determine if an institution may be exempted from the requirement of a site visit if the following conditions are met:<sup>5</sup>

- An institution has successfully completed at least one cycle of accreditation of maximum length offered by the Commission (six years) and one renewal or has been accredited for at least ten years and has three additional locations already approved by the Commission through the substantive change process.
- The institution has demonstrated sufficient capacity to add additional locations without individual prior approvals, including at a minimum satisfactory evidence of a system to ensure quality across a distributed enterprise that includes: clearly identified academic control; regular evaluation of the locations; adequate faculty, facilities, resources, and academic and student support systems; financial stability;

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<sup>4</sup> See the Policy on Closing an Institution for a fuller discussion of requirements related to closing an institution and teach-out plans for institutional or programmatic closures.

<sup>5</sup> If the new location meets the definition of a branch campus, then a site visit will be required. A branch campus is defined in 34 CFR 600.2 as a location of an institution that is geographically apart and independent of the main campus of that institution and that (1) is permanent in nature; (2) offers courses in educational programs leading to a degree, certificate, or other recognized educational credential; (3) has its own faculty and administrative or supervisory organization; and (4) has its own budgetary and hiring authority. [Emphasis added.] In addition to other items of review for new locations, the Commission will review the business plan for a branch campus in determining whether to approve a substantive change or not.

and long-range planning for expansion.

The Commission must determine the institution's fiscal and administrative capacity to operate the additional location. In addition, the Commission shall arrange a visit, within six months of review, to each additional location the institution establishes if the institution has a total of 3 or fewer additional locations, has not demonstrated to the Commission's satisfaction that it has a proven record of effective educational oversight of additional locations or has been placed on sanction by the Commission. 34 C.F.R § 602.22(c). The purpose of the site visits is to verify that the additional location(s) has the personnel, facilities, and resources the institution claimed to have in its application to the Commission for approval of the additional location(s).

The Commission may not approve an institution's addition of locations after the institution undergoes a change in ownership resulting in a change of control as defined in 34 C.F.R. § 600.31 until the institution demonstrates that it meets the conditions for the agency to pre-approve additional locations described in 34 C.F.R. § 602.22.

### **Change in the Control or Legal Status of the Institution**

- any change in the form of control, legal status, or ownership of the institution
- a merger with another institution<sup>6</sup>
- the separation of one unit of the institution into separate institutions, dividing an institution into two or more separately controlled and accredited units
- the acquisition of any other institution or program or location of another institution, and/or the addition of a permanent location at the site of a teach-out the institution is conducting
- contracting for the delivery of courses or programs in the name of the institution with a non-regionally-accredited organization
- a change by a parent institution of one of its off-campus sites into a separate institution

### **Change in Courses or Programs or their Mode of Delivery that Represents a Significant Departure from Current Practice**

- a change in the mode or location of delivery when the courses constitute 50% or more of a program, degree or certificate and/or are offered at a new or different location or through distance education or correspondence education for the total amount of credits awarded for courses or programs; addition of courses that constitute 50% or more of a program or 50% of the institution's courses offered through a mode of distance or electronic delivery
- the addition of courses or new programs that represent a significant departure from existing offerings of educational programs or methods of delivery from those that were offered when the institution was last evaluated
- addition of programs of study at a degree or credential level different from that which is included in the institution's current accreditation or preaccreditation

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<sup>6</sup> See also Policy on Contractual Relationships with Non-Regionally Accredited Organizations

### **A Change in Credit Awarded**

- a substantial increase or decrease in the number of clock or credit hours awarded for the successful completion of a program
- a change from clock hours to credit hours
- a change in rigor of the credit hour

### **Implementation of a Direct Assessment Program**

- an instructional program that, in lieu of clock hours or credit hours, utilizes direct assessment of student learning
- an instructional program that recognizes the direct assessment of student learning by others
- a program that must obtain USDE approval as a direct assessment program under 34 C.F.R. § 668.10

### **A Contractual Relationship with a Non-Regionally-Accredited Organization**

A contractual relationship with a non-regionally-accredited organization is considered a substantive change when more than 25 percent of one or more of the accredited institution's educational programs is offered by the non-regionally-accredited organization. 34 C.F.R. § 602.22(a)(2)(vii).