



**ACCJC**

ACCREDITING COMMISSION FOR  
COMMUNITY AND JUNIOR COLLEGES  
WESTERN ASSOCIATION OF SCHOOLS AND COLLEGES

# Substantive Change Manual

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## Introduction

The Accrediting Commission for Community and Junior Colleges (ACCJC) supports all efforts to continuously improve the quality of learning at our member institutions. As such, change is constant. Defined by federal regulations, an institutional change that significantly affects quality, mission, scope, or control is considered substantive. The U.S. Department of Education (ED) regulations require that accrediting agencies have policies and procedures that ensure that any substantive changes to the institution, its educational mission, or programs do not adversely affect the capacity of the institution to continue to meet Eligibility Requirements, Accreditation Standards, and Commission policies. Federal law mandates that accrediting agencies require institutions to obtain accreditor approval of a substantive change before it is included in the scope of the accreditation granted to the institution (34 CFR §602.22).

The ACCJC is committed to supporting our member institutions' efforts to ensuring quality in higher learning. The revised manual is the result of comments and concerns from practitioners in the field. The ACCJC staff and Commissioners work with an advisory committee comprised of accreditation liaison officers from across the region to streamline the substantive change process in order to help institutions meet their students' needs.

ACCJC staff and Commissioners would like to extend our appreciation for the work of the Substantive Change Advisory Group:

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# **1 Changes the Commission Considers Substantive**

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

- Change in the mission or character of the institution. If the mission or character of the institution becomes dramatically different, the Commission reserves the right to require the institution to complete the eligibility, candidacy, and initial accreditation process
- 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
- Change in the official name of the institution
- Merger of two separately-accredited ACCJC institutions into a single institution
- Reduction of programs to an extent that the institution's mission cannot be accomplished

## **1.2 Change in the Nature of the Constituency Served**

- Change in the intended student population
- Closure of an institution or degree level program, loss of state authorization or licensure for the institution or a program, or withdrawal of accreditation if such withdrawal will result in closure<sup>1</sup>
- Closure of a permanent 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

## **1.3 Change in the Location or Geographic Area Served**

- Move of the institution to a new permanent location or an addition of a permanent location, geographically apart from the main campus, where students can complete 50% or more of a program. The offering of courses and programs at a high school (dual enrollment) or a correctional institution do not constitute a change of location that requires substantive change approval, unless the college has USDE approval to offer federal financial to these student populations. The Substantive Change Committee will determine if an institution applying for substantive change for a new permanent location requires a visit to the site. Considerations related to an additional or new location include the following:
  - The institution must have the fiscal and administrative capacity to operate the additional location. If required, a visit will be arranged within six months of review to an additional or new location the institution establishes. The purpose of the site visit is to verify that the location has the personnel, facilities, and resources the institution claimed to have in its substantive change application.
  - New international locations at which 50% or more of at least one program will be offered require review by the Substantive Change Committee. The first international location in each country requires a follow-up site visit six months to one year after implementation. Additional locations in a country may require a visit at the Substantive Change Committee's discretion (see Policy on Contractual Relationships with Non-Accredited Organizations <https://accjc.org/wp-content/uploads/Contractual-Relationships.pdf> and Policy on Principles of Good Practice in Overseas International Education Programs for Non-U.S. Nationals <https://accjc.org/wp-content/uploads/Principles-of-Good-Practice-in-Overseas.pdf>)

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<sup>1</sup> See the Policy on Closing an Institution for further discussion of requirements related to closing an institution and teach-out plans for institutional or programmatic closures.

- The Substantive Change Committee may not approve an institution’s addition of locations after the institution undergoes a change in ownership resulting in a change of control<sup>2</sup> until the institution demonstrates that it meets the conditions for the Commission to pre-approve additional locations.<sup>3</sup>

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

- Change in the form of control, legal status, or ownership of the institution
- Merger with another institution<sup>4</sup>
- Separation of one unit of the institution into separate institutions, dividing an institution into two or more separately controlled and accredited units, or a change of an off-campus site into a separate institution
- 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

#### **1.5 Change in Courses or Programs or their Mode of Delivery that Represents a Significant Departure from Current Practice<sup>5</sup>**

A change that represents a significant departure from current practice in the mode or location of courses occurs when the change constitutes 50% or more of a program, degree or certificate. This includes the following:

- Programs offered at a new or different permanent location operated by the college
- Programs offered exclusively or primarily through distance education or correspondence education
- Course additions that constitute 50% or more of a degree program
- Addition of programs that represent a significant departure from existing offerings of educational programs or methods of delivery from those offered when the institution was last evaluated. The following changes are considered significant departures for Substantive Change purposes:
  - New permanent locations (either owned or leased by the college on a long-term basis);
  - Distance education offered as a new modality (for the first time that an institution offers on-line instruction for 50% or more of a program);
  - New distance education programs, if the college has not submitted and received approval on at least one substantive change application;
  - Certificate (16 units/credits or greater) or a Degree that requires additional significant institutional resource (Human resources, physical resources, technical resources) commitment.

Institutions may make changes that are not considered as a substantial deviation from existing practices or programs. Changes that are generally considered as not substantive, however, do require review and administrative approval by the ACCJC to ensure that student access to federal financial aid is assured. The following changes are not considered significant departures for Substantive Change Purposes:

<sup>2</sup> as defined in 34 C.F.R. § 600.3.1

<sup>3</sup> 34 C.F.R. §602.22(a)(2)(viii)(D)

<sup>4</sup> See also *Policy on Contractual Relationships with Non-Regionally Accredited Organizations*

<sup>5</sup> ACCJC reserves the right, in accordance with Federal Policy, to grant temporary approval of programs with 50% or more of their offerings through distance or correspondence education modalities in response to emergency situations.

- Use of a location for 50% or more of a program that is not considered a permanent location for the institution but rather is for occasional or incidental use (such as borrowed facilities, area schools, jails and prisons, etc.)
  - Dual credit programs at high schools and programs offered at correctional facilities do not require substantive change applications unless the college has USDE approval to provide federal financial aid to those student populations;
- Certificates integral to existing degrees (Associate of Science, Associate of Arts, or Associate Degrees for Transfer) or new Degrees where less than 50% of the courses are new to the institution.
- Distance education programs, if the college has not submitted and received approval on at least one substantive change application.

## **1.6 Change in Credit Awarded**

- Substantial increase or decrease in the number of clock or credit hours awarded for the successful completion of a program
- Change from clock hours to credit hours

## **1.7 Implementation of Direct Assessment<sup>6</sup>**

- Change of an instructional program from clock hours or credit hours, to direct assessment of student learning. A program must obtain ED approval as a direct assessment program.<sup>7</sup>

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

- More than 25% of one or more of the accredited institution's for-credit educational programs are offered by the non-regionally-accredited organization.<sup>8</sup>

## **1.9 Any Other Significant Change**

The Commission reserves the right to request reports and visits to assess the effects of any change it deems to be a significant departure from the previous reaffirmation of accreditation.

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<sup>6</sup> See the *Policy on Direct Assessment of Learning*

<sup>7</sup> See 34 C.F.R. § 668.10

<sup>8</sup> 34 C.F.R. § 602.22(a)(2)(vii)

## 2 Timing considerations for Substantive Changes

Substantive change approval is needed before an applicable change can be implemented to ensure affected students can qualify for federal financial aid. A substantive change application should be submitted when the institution is able to demonstrate and provide evidence that the change meets Eligibility Requirements, Accreditation Standards, and Commission policies and any specific evaluation criteria. **Substantive Change Applications are due to the ACCJC 45 days prior to the scheduled meeting of the Substantive Change Committee.** Due dates are posted on the ACCJC website (ACCJC.org).

In the following circumstances, institutions may not submit a substantive change application:

- In the six-month period preceding a comprehensive evaluation team visit.
- During the period that an institution is on a sanction such as Warning, Probation, or Show Cause until the conditions that resulted in a sanction have been resolved and the Commission has reaffirmed accreditation. If the sanction includes a specific recommendation which cites as a non-compliance the institution's failure to seek substantive change approval of an existing program, delivery mode, or location, then, to the extent of that recommendation only, the institution may proceed with a substantive change application.
- If the institution is subject to withdrawal of accreditation, pending the outcome of administrative remedies.

## 3 Substantive Change Review Process

### 3.1 Step 1: Determination whether a Change is Considered Substantive

Section 1 above identifies those changes that are considered substantive and require review and approval prior to implementation. Institutions are required to submit the Substantive Change Inquiry Form for each change, so that a determination can be made as to whether the change requires a full Substantive Change Application or whether an Administrative Approval can be granted. Only ALOs may submit inquiries and applications. The Substantive Change Inquiry Form can be accessed [here](#).

### 3.2 Step 2: Develop the Application

- Once it has been determined that the proposed change requires approval of the Substantive Change Committee, the institution should develop the Application using the appropriate Substantive Change Application Form. Specific Templates are available for New Program, New Location, Distance Education – Intentional program, and Change in Local Control. Once it has been determined that a Sub Change Application is required, staff will provide the appropriate template.
- The ALO is responsible for disseminating this information to the institutional representatives drafting the application. They are also responsible for reviewing the application for completeness and accuracy prior to submittal to the ACCJC.
- As noted above, a number of templates have been developed to correspond to the types of substantive change. Each question in the template must be addressed.
- Prior to submission, applications must obtain all relevant internal approvals, including administrative and governance reviews, to ensure adherence to the institution's quality



assurance processes. Faculty must be appropriately involved in developing and approving programs, especially those who will be responsible for instructional delivery and assessment.

### 3.3 Step 3: Submit the Application and Fee

- Once the Application has been completed, it should be submitted with the appropriate forms and the fee. The application should be submitted no later than 45 days prior to the meeting dates of the Substantive Change Committee as posted on the ACCJC website. Substantive Change Fees are specified in the ACCJC Fee Schedule. This fee schedule is adjusted periodically. Colleges should consult the Fee Schedule to ascertain the fee required. Reviews are scheduled on a first-come, first-served basis. Receipt of the Substantive Change Application and fee will reserve a place on the Substantive Change Committee's Agenda. The Substantive Change Committee will determine how many applications will be reviewed at a meeting. Applications that are unable to be reviewed will be scheduled for the next regular meeting of the Committee.

#### **Preliminary Review by ACCJC Staff**

Once an application has been submitted, ACCJC staff will review the application and give the institution the opportunity to provide missing information and to clarify any aspects of the application that are unclear. The ACCJC Staff and the Substantive Change Committee reserve the right to remove any application that is incomplete. The preliminary review is designed to assist institutions in avoiding a denial or deferral of the application.

### 3.4 Step 4: Receive Notification of Action from the ACCJC

The ACCJC Substantive Change Committee will take one of the following Actions:

**Approve the substantive change.** The institution has demonstrated that it meets the evaluation criteria.

**Approve the substantive change and require a Follow-Up Report with or without a visit, or a visit without an institutional report.** The institution meets the evaluation criteria, but the committee has specific questions (which don't require deferral), feels general verification is needed of sustained practice, or has questions concerning further implementation stages. A visit timeline will be specified: 6-18 months. The Committee will review the report(s).

**Provisionally approve a planned substantive change that is subject to a federally mandated site visit.** The institution's submitted plans for a change of ownership, new location, or creation of a branch campus demonstrate future actions that will meet the evaluation criteria. The provisional approval allows the institution to move forward with steps of implementation in preparation for seeking approval of the substantive change. The provisional approval may include a site visit. The provisional approval must state a date, not to exceed three years, by which the change must be approved for inclusion in the institution's accreditation. If that time is exceeded, then the substantive change request process must be initiated anew. A new location which requires a federally mandated site visit cannot be provisionally approved if there has been a change in ownership since the institution has successfully had three new locations approved by substantive change. The Committee may require additional reports or visits before the approval is final.

**Defer pending additional information.** Consideration of the request cannot move forward without receipt of additional information demonstrating the evaluation criteria are met.

**Deny the substantive change.** The institution has not demonstrated that the change meets the evaluation criteria.

**Refer the proposed change to the Commission.** The substantive change application can be referred by the Substantive Change Committee to the Commission when it has determined there may be the need for a comprehensive evaluation or for a special report and visit. The evaluation of the institution's substantive change follow-up report and/or visit may also be referred to the Commission when deemed appropriate for review by the full Commission. The Committee's referral to the Commission will include the reasons for such referral.

### **Appeal of the Committee Decision**

If an application is not accepted, the institution may request that the Committee reconsider its decision. The request for reconsideration must be received by the ACCJC within 30 days of the notice of denial.

### **Substantive Change Appeal Process**

- If the institution wishes to appeal the decision of the Committee on Substantive Change, the appeal must be filed in writing and will be deliberated at the next meeting of the Commission.
- Members of the Committee on Substantive Change may participate in the discussion but will abstain from voting on the appeal.

## **3.5 Step 5: Requirements on institutions after approval of substantive changes visits**

Federal regulations require that certain substantive changes include a site visit as part of the approval. Generally, visits are required when there is a new location where at least 50% of a program is offered, when a new branch campus is established, or when there is a change of ownership that results in a change of control. Visits occur within six months of the start of operations.

### **Federally mandated visits**

- **New permanent location where at least 50% of an educational program is offered.** When there is a change that constitutes 50% or more of a program, certificate, or degree, at a new permanent location, a federally-mandated site visit is required. The purpose of the visit is to verify that the information provided by the institution in its substantive change application was accurate and complete. It is also used to verify that the actions implemented align with the plans that received provisional approval by the committee.
- **Branch Campus.** Substantive Change uses the federal regulation definition of a Branch Campus. An institution must provide a business plan in advance of establishing a branch campus (describing the educational programs, the projected revenues/ expenditures/cash flow, the operation, management and physical resources of the branch campus). Approval (accreditation) can only be given after determining the campus has sufficient educational, financial, operational, management, and physical resources.

- Change of Ownership. A Change in the ownership of an institution is one which results in a change of control. The Substantive Change Committee will designate the effective date of the approval, which will be within 30 days of the change of ownership.

The Substantive Change Committee may also require a site visit if it deems that a visit would be appropriate. This could include, but not be limited to the following:

- If the institution is not due for a comprehensive evaluation within two years of the approval of the substantive change, an on-site evaluation or other review may be required by the Commission.
- If there has been rapid growth in the number of such locations.

#### **Substantive Change team visits:**

The Substantive Change Committee may require visits for approved changes where additional confirmation of conditions is desired. Substantive Change visiting teams consist of academic and/or administrative evaluators. These visits may also include a member of the Commission staff. The size of the visiting team will be a function of the complexity and size of the site and/or proposed change. The visiting team will focus on the content of the original Substantive Change Application and any updated information requested by Commission staff prior to the visit, as well as any stated concerns of the Committee on Substantive Change.

Note: The Commission requires institutions to absorb the costs of a site visit.

#### **Institutional Follow-Up**

- The Commission may require institutions to submit Special Reports on specific issues precipitated by the substantive change. These reports make it possible for the Commission to assess the impact of the change once it has been implemented.
- Requirements for these reports will be specified in the action letter approving the substantive change. Institutions should include updates of approved substantive changes in their next Institutional Self-Evaluation and Midterm reports.
- Comprehensive Evaluation team chairs are supplied with a matrix of substantive changes since the last comprehensive visit.

# Appendices

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## Appendix A: Brief Descriptions of Selected Policies

There are Commission policies that are particularly relevant to substantive changes. The complete Policies are available on the ACCJC website.

The **“Policy on Substantive Change”** provides the framework for this manual and all actions related to Substantive Change. The policy can be accessed [here](#).

The **“Policy on Award of Credit”** details the requirements and expectations for awarding credit at a member institution. The Accreditation Standards require that the units awarded be consistent with institutional policies that reflect generally accepted norms in higher education. In addition, institutions increasingly are providing more varied educational experiences as a means for students to earn college credits such as distance education, independent study, group project work, study abroad, work-experience, transfer of credits from other institutions, credit by examination, and through direct assessment programs. Institutional policy and practice in award of credit must assure the integrity of credit awarded to all educational experiences. Access the policy [here](#).

The **“Policy on Closing an Institution”** includes requirements of provisions for student completion of programs and transfer to other institutions, academic records, financial aid, faculty and staff, and completion of institutional financial obligations. Access the policy [here](#).

The **“Policy on Contractual Relationships with Non-Regionally Accredited Organizations”** details the controls institutions must have in place when contracting with another entity to provide courses or programs. The policy provides guidance for contract content. Access the policy [here](#).

In the **“Policy on Distance Education and on Correspondence Education”** the Commission recognizes that most institutions will make use of the growing range of systems for delivery of instruction, including various electronic means. The policy is based on principles of good practice to help assure that distance learning is characterized by the same concerns for quality, integrity, and effectiveness that apply to more traditional modes of instruction. Access the policy [here](#).

The **“Policy on Institutions with Related Entities”** is intended to ensure that accreditors receive appropriate assurances and sufficient information and documentation to determine whether such institutions comply with Eligibility Requirements, Accreditation Standards and Commission policies (together Commission’s Standards). It addresses change of ownership and details the specific information that is needed in addition to information required by the Policy on Substantive Change or other policies. Access the policy [here](#).

The **“Protocol and Policy on the Accreditation of Baccalaureate Degrees”** provides guidance to colleges that wish to apply for authorization to offer a Baccalaureate Degree through the Substantive Change process. The college must meet all elements of the Protocol before approval will be granted (See appendix C).

## Appendix B: Definitions

**Branch Campus:** Federal regulations define a branch campus as a location of an institution that is geographically apart and independent of the main campus of that institution. The branch location of an institution is independent if it is (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.

**Permanent Location:** A permanent location is a location either purchased or leased for a term of five or more years. The lease can be either for the full term or renewable for the minimum period.

Other Definitions will be added as the need is identified.