

# SUBSTANTIVE CHANGE MANUAL

*A Publication of the Accrediting Commission  
for Community and Junior Colleges  
Western Association of Schools and Colleges*

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# 1 Principles Underlying Substantive Change

The following principles underlie the purpose of substantive change:

*The Accrediting Commission for Community and Junior Colleges, Western Association of Schools and Colleges (ACCJC/WASC) encourages change.* The ACCJC (Commission) promotes educational innovation and experimentation that is responsible and appropriate to the institutional mission.

*The ACCJC requires change to improve the institution.* A primary purpose of accreditation is to promote institutional improvement. The Accreditation Standards require that institutions engage in an ongoing effort to improve their programs and services. The ACCJC recognizes that without application of fresh approaches to identified opportunities and problems, improvement cannot occur.

*The ACCJC anticipates that institutions will respond to evidence of the need for change.* Accreditation Standards require that institutions engage in an ongoing process of evaluation, improvement, and re-evaluation. Evaluation yields evidence of institutional performance that is often the stimulus for change.

*The ACCJC expects institutions to undertake change responsibly.* In order to maintain their integrity, institutions must guarantee the quality of their programs and services, even as they make changes.

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## 2 Rationale for Requiring Approval of Substantive Changes

The U.S. Department of Education (USDE) regulations require that accrediting agencies have adequate policies and procedures to 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.

The ACCJC and other accrediting commissions authorized by the USDE, are required to review certain types of substantive changes (“Policy on Substantive Change,” Appendix A).

The accreditation of an institution is, in part, an affirmation that the institution has established conditions and procedures under which its mission and goals can be realized and that the institution can demonstrate accomplishment. When the ACCJC accredits an institution, or reaffirms its accreditation, it acts on the basis of conditions existing at the time of the Commission’s action. Because institutions are in continual processes of change, the Commission requires that substantive changes be evaluated and approved to ensure that Eligibility Requirements, Accreditation Standards and Commission policies continue to be met. An ACCJC/WASC institution seeks approval for the change by submitting a Substantive Change Proposal.

The substantive change review process provides the Commission a means for ensuring that a college maintains the educational quality and integrity of its programs and services, and that the substantive change is consistent with the institutional mission. When the Commission defers an action on accredited status, or places an institution on a sanction such as Warning, Probation, or Show Cause, the Commission may defer consideration of any substantive change request until the deficiencies have been resolved and the Commission has reaffirmed accreditation.

In all cases, substantive change requires *prior* Commission approval. In some cases, a visit is necessary to gather facts about the planned change (before a substantive change decision) or to confirm the impact of the change on the institution’s ability to meet Eligibility Requirements, Accreditation Standards and Commission policies (after a decision). Implementing a substantive change without prior Commission approval may result in a Commission decision to re-evaluate the college’s accredited status.

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## 3 Changes the Commission Considers Substantive

Below is a list of conditions which require substantive change approval in order to comply with new Higher Education Opportunity Act (HEOA) regulations [34 C.F.R. § 602.22]. Illustrations (not exhaustive) and key institutional considerations for each condition are included; key considerations suggest points upon which the institution should focus the proposal. The proposal should address all of the required elements (as described in 4.2, Step Three, "Required Format and Content of the Substantive Change Proposal"). Conditions *subject to prior substantive change review and approval by the Commission* include:

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

#### 3.1.1 A Change in the Purpose or Character of the Institution

*Example:*

The institution changes its private or public character, including changes in the denominational character of a religiously-affiliated institution.

*Key Considerations:*

- The mission statement is fundamental to determining the institution's programs and services, its governance and decision-making processes, and its planning. An institution undertaking a change in purpose or scope would likely revise its mission statement. The resulting statement should define the institution's broad educational purposes, its intended student population, and its commitment to achieve student learning.
- The Commission may require a comprehensive review for a change in mission.

#### 3.1.2 A Change in the Degree Level from that which was Previously Offered by the Institution

*Example:*

The college offers a program at a level different from the two-year associate degree, e.g., a third year and/or upper division of a program; a four-year baccalaureate degree.

*Key Considerations:*

- In particular, the proposal must present evidence of the institution's ability to provide courses consistent in quality and rigor with the Eligibility Requirements, Accreditation Standards and Commission policies.

#### 3.1.3 Any Change in the Official Name of the Institution

*Example:*

An institution replaces its name with the name of its district or system.

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*Key Considerations:*

- The proposal must present evidence that it has made proper notification of its change of name, including notifying the USDE if the institution participates in federal financial aid programs. Any change in name must be consistent with the institution's mission.

## 3.2 Change in the Nature of the Constituency Served

### 3.2.1 A Change in the Intended Student Population

*Example:*

An institution offers courses or programs via online delivery intended to reach students not included in the student population described in the current institutional mission statement.

*Key Considerations:*

- The proposal must present evidence that the college has reviewed its mission statement to determine whether the new population falls within its intended student population. A significant revision of the mission statement may be indicated.
- The institution needs to know where its Distance Education and Correspondence Education (DE/CE) students reside and if out-of-state, are there any state authorization processes or procedures that must be followed.
- The institution should also consult the *Guide to Evaluating Distance Education and Correspondence Education* for the principles that apply to good practice, and the Commission's "Policy on Distance Education and on Correspondence Education" to ensure that it continues to meet Eligibility Requirements, Accreditation Standards and Commission policies.

### 3.2.2 The Closure of an Institution

*Example:*

An institution ceases to offer all educational courses or programs.

*Key Considerations:*

- Institutions planning closure must follow the Commission's "Policy on Closing an Institution." In particular, the proposal must present evidence that the institution has made appropriate arrangements for students to complete their programs of study and for transfer of student records to other institutions. The institution should also make arrangements for transfer of financial aid awards.
- If an institution closes programs offered, it needs to make appropriate arrangements for students enrolled in these programs to complete their educational goals.

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### 3.3 Change in the Location or Geographic Area Served

#### 3.3.1 Offering Courses or Programs Outside the Geographic Region Currently Served

*Example:*

An institution offers and/or transports courses or programs to a new campus location outside the community described in the current institutional mission statement or outside the WASC region, including international sites.

*Key Considerations:*

- The evaluation of institutions that deliver education at a physical site in another region will be undertaken with the participation of the host regional accrediting commission. This will include the joint (home/host) review of off-campus sites in a host region against the Accreditation Standards of that region. Please see the Interregional Policies on the Accreditation of Institutions Operating Across Regions.
- An institution planning to establish a site outside of the United States (U.S.), designed to serve non-U.S. nationals, must follow the Commission's "Policy on Principles of Good Practice in Overseas International Education Programs for non-U.S. Nationals" and the "Policy on Contractual Relationships with non-Regionally Accredited Organizations."
- The proposal must present evidence that the institution will maintain sufficient control of the program, site, personnel, and policies to ensure continued compliance with Eligibility Requirements, Accreditation Standards, Commission policies and quality equivalent to the main campus.

#### 3.3.2 Establishing an Additional Location Geographically Apart from the Main Campus at which the Institution offers at least 50% of an Educational Program

*Examples:*

An institution offers at least half of the courses required for an associate's degree or career technical education certificate at a single off-campus location. An institution transports, transfers, or duplicates at least half of the courses required for an associate's degree or career technical education certificate to a new location or site, geographically apart from the main campus, and different from or in addition to previously approved sites.

*Key Considerations:*

- The proposal must provide the address and present evidence of sufficient control over the site to assure the quality of programs and services.
- Students must have access to support services and learning resources appropriate to the programs offered at the location and comparable to the main campus.

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- The proposal must present evidence that the site meets Eligibility Requirements, Accreditation Standards and Commission policies for safety, security, facilities, equipment, and appropriateness for the institutional programs and services conducted at the site.
  - The institution must also demonstrate its ability and commitment to meet the fiscal requirements and sustainability of the additional location.
  - For purposes of compliance with federal recognition requirements, the Substantive Change Proposal constitutes the business plan for the establishment of a branch campus.
  - The Commission requires a visit within six months of the start of operation at the new facility to verify that the institution has the personnel, facilities, and resources reported in the Substantive Change Proposal.
  - If the substantive change is to establish an additional branch campus location, private institutions must include projected revenues and expenditures, and cash flow at a branch campus.
  - Public institutions, in keeping with the financial reporting requirements of their district, system, or governmental agency, must include financial information which allows for comparable analysis of the financial planning and management of a branch campus.

### 3.3.3 Closing a Location Geographically Apart from the Main Campus at which Students were able to complete at least 50% of an Educational Program

*Example:*

An institution closes a campus where students have been able to take at least half of the courses applicable to an associate's degree or certificate.

*Key Considerations:*

- Institutions planning closure of a site must follow the Commission's "Policy on Closing an Institution" in the *Accreditation Reference Handbook*. Should the college wish to reopen the site, a second Substantive Change Proposal, and visit will occur prior to reopening to verify that the institution has the personnel, facilities, and resources reported in the proposal. The proposal must present evidence of institutional quality consistent with Eligibility Requirements, Accreditation Standards and Commission policies.

New Higher Education Opportunity Act (HEOA) regulatory language requires that ACCJC/WASC accredited and candidate institutions submit a teach-out plan for approval upon occurrence of any of the following events:

- The USDE notifies the accrediting agency that it has taken an emergency action or taken action to limit, suspend, or terminate the participation of the institution in any Title IV program;
- The accrediting agency acts to withdraw, terminate or suspend the accreditation of the institution; or

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- The institution notifies the accrediting agency that the institution intends to cease operations.

The HEOA amendments stipulate that the USDE may not recognize an accrediting agency for purposes of Title IV eligibility unless the institution has submitted and received approval of the teach-out plan by the accrediting agency.

### 3.4 Change in the Control of the Institution

#### 3.4.1 Any Change in the Legal Status, Form of Control, or Ownership of the Institution

The Commission requires a visit within six months of the change of status, form of control, or ownership.

*Example:*

Sponsorship or ownership of a private institution changes

*Key Considerations:*

- The Substantive Change Proposal must present evidence of the fiscal soundness of the entity acquiring or purchasing the institution. In the case of a private institution with a corporate and a governing board, the proposal must clearly state which body is responsible for policies; which body confirms that institutional practices are consistent with the board-approved institutional mission statement and policies; how these two bodies achieve these overlapping purposes; which body has ultimate authority for these operations; the president/CEO role; and how authority is vested and organized. Institutions planning this type of substantive change should refer to the Commission's "Policy on Institutions with Related Entities," in the *Accreditation Reference Handbook*.
- Institutions undergoing changes in ownership, control, and/or legal status are visited within six months of the implementation of the change to verify that the institution has the human, physical, technology and financial resources reported in the Substantive Change Proposal.

*Example:*

A for-profit institution becomes a non-profit institution.

*Key Considerations:*

- The proposal must present evidence of how the change will impact the financial stability of the institution and its ability to meet Eligibility Requirements, Accreditation Standards and Commission policies for high-quality educational programs and services.

*Example:*

The district/system changes provision for administrative governance or other support services to one or more colleges.

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*Key Considerations:*

- The proposal must explain how the college(s) will address proposed changes in support services and how the proposed administrative structure will enable the college(s) to continue to meet Eligibility Requirements, Accreditation Standards and Commission policies.

### **3.5 The Acquisition of another Institution, or any Program or Location of another Institution**

*Example:*

A comprehensive college assumes responsibility for the programs offered by a specialized institution.

*Key Considerations:*

- The proposal must present evidence that the institution has made appropriate transition arrangements for students.
- The proposal must present evidence that the college can sustain the quality of the programs and services.

### **3.6 Contracting for the Delivery of Courses or Programs in the Name of the Institution with a Non-regionally Accredited Organization**

*Example:*

An institution contracts with a commercial organization for that organization to provide more than 25% of the instruction on behalf of the institution.

*Key Considerations:*

- Institutions planning to contract with an organization to deliver, create, or provide courses or programs in the name of the institution or district/system must follow the Commission's "Policy on Contractual Relationships with Non-Regionally Accredited Organizations." The contract must guarantee the college sufficient control to assure that the quality of the courses or programs meet all Eligibility Requirements, Accreditation Standards and Commission policies.

#### **3.6.1 A Change by a Parent Institution of One of its Off-Campus Sites into a Separate Institution**

*Example:*

An institution with two campuses decides to divide into two colleges, each independently capable of offering a two-year degree.

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*Key Considerations:*

- If the change involves the formation of a separate institution from an off-campus center or branch campus, the institution must provide projected financial information for the parent institution of the proposed division. The focus of this proposal should be the anticipated impact of the change on the parent college. The new separate institution must begin the process for separate accreditation with an application for Eligibility.

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

#### **3.7.1 Addition of a Program or Courses that Represents a Significant Departure from an Institution's Current Programs or Curriculum**

*Examples:*

An institution offers a program in a field requiring substantial new curriculum, faculty, equipment or facilities, such as a program with a clinical component.

A specialized institution offers courses in a field requiring substantial new curriculum, faculty, equipment, or facilities.

A program offered in face-to-face format is now offered 100% online.

*Key Considerations:*

- Evidence supporting the need for the program should be presented in the proposal. The institution must ensure that sufficient fiscal resources are available to support the program by providing a cost-impact analysis, and that the curriculum, faculty, equipment and facilities meet Eligibility Requirements, Accreditation Standards and Commission policies. These program resources must be in place prior to submission of the Substantive Change Proposal. The college should consider the consistency between the proposed program and the institutional mission.

#### **3.7.2 Addition of a New Degree or Career Technical Education Certificate Program that Represents a Significant Departure from an Institution's Current Programs**

*Example:*

An institution develops a new degree or career technical education certificate program to be offered at the main campus or at any one of the approved institutional sites off campus.

*Key Considerations:*

- The institution must ensure that the curriculum, faculty, equipment and facilities meet Eligibility Requirements, Accreditation Standards and Commission

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policies. These resources must be in place prior to submission of the Substantive Change Proposal. The proposal must include workforce and labor market data.

### 3.7.3 Addition of Courses that Constitute 50% or More of the Units in a Program Offered through a Mode of Distance or Electronic Delivery, or Correspondence Education

*Example:*

An institution offers courses that make up 50% or more of the credits required for a program through an instructional delivery that is new for the college or the program.

*Key Considerations:*

The institution should consult the *Guide to Evaluating Distance Education and Correspondence Education* and Commission's "Policy on Distance Education and on Correspondence Education" for appropriate guidelines.

- The college must be knowledgeable about current federal regulations related to DE/CE.
- There must be a policy that defines "regular and substantive interaction" for DE courses (34 C.F.R. § 602.3).
- The college's policy on academic freedom applies to DE/CE and is monitored.
- New HEOA regulations require institutions which offer distance education or correspondence education to have processes in place through which the institution establishes that the student who registers in a distance education or correspondence course or program is the same person who participates each time, completes the course or program and receives the academic credit.
- The requirement above will be met if the institution verifies the identity of a student who participates in class or coursework by using, at the institution's discretion, such methods as a secure log-in and password, proctored examinations, and/or new or other technologies and/or practices that are developed and effective in verifying students' identification.
- The institution must also publish to its students the policies to the effect that, in achieving these outcomes, it ensures the protection of student privacy and will notify students at the time of class registration of any charges associated with verification of student identity.

## HIGHER EDUCATION OPPORTUNITY ACT DEFINITIONS

### Definition of Distance Education

*Distance Education means (34 C.F.R. § 602.3):*

*Education that uses one or more of the technologies listed in paragraphs (1) through (4) to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously. The technologies may include:*

*(1) the internet;*

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- (2) *one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;*
  - (3) *audioconferencing; or*
  - (4) *video cassettes, DVDs, and CD-ROMs, if the cassettes, DVDs, or CD-ROMs are used in a course in conjunction with any of the technologies listed in paragraphs (1) through (3).*

### **Definition of Correspondence Education**

*Correspondence education means (34 C.F.R. § 602.3.):*

- (1) *education provided through one or more courses by an institution under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor.*
- (2) *interaction between the instructor and the student is limited, is not regular and substantive, and is primarily initiated by the student.*
- (3) *correspondence courses are typically self-paced.*
- (4) *correspondence education is not distance education.*

## **3.8 Change in Credit Awarded**

### **3.8.1 An Increase of 50% or More in the Number of Credit Hours Awarded or Required for the Successful Completion of a Program**

*Example:*

An institution changes a required 20 credit hours for a particular certificate to 30 credit hours.

*Key Considerations:*

- The proposal should provide evidence supporting the need and benefit to students, and evidence of necessary resources.

### **3.8.2 Changes in Clock Hours and/or Credit Hours**

*Example:*

An institution changes the foundation for recognition of programs or course completion from clock hours to a calculation based on the Carnegie unit.

*Key Considerations:*

- The institution should review the Commission's "Policy on Institutional Degrees and Credits."
- The proposal should provide evidence of positive impact for students and the institution, and evidence of necessary resources.

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### 3.9 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 (“Policy on Substantive Change,” Appendix A, page 26).

These changes, because they may affect the quality, integrity, and effectiveness of the total institution, are subject to review prior to as well as subsequent to implementation. Institutions have reported loss of federal financial aid when substantive changes were not approved by regional accrediting bodies.

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## 4 Substantive Change Review and Approval Process

### 4.1 Eligibility for Proposal Submission

- An accredited institution is expected to complete this process sufficiently in advance of a substantive change to permit approval before the change is instituted.
- Institutions which have been declared eligible for accreditation but have not yet achieved candidate or accredited status may not initiate the substantive change approval process.
- Institutions scheduled for an external evaluation site visit may not initiate the substantive change approval process in the six-month period preceding the visit.

*Note: Please see "Rationale for Requiring Approval of Substantive Changes" for proposal submission timing as it relates to a Commission accreditation sanction (page 2 of this Manual).*

### 4.2 Sequential Steps in Preparing a Substantive Change Proposal

#### Step One: Establish the Need for Substantive Change

1. The first step in the process for a substantive change review is to formally communicate to the Commission's substantive change staff (via email or U.S. Postal Service) a description of the proposed change, the need for the change, and the anticipated effects.
2. Early notification enables the staff to provide information and advice about the effect of the proposed change on the accredited status of the institution and to assist the college in preparing a complete proposal.
3. Staff will suggest to the institution areas of particular concern to the Committee on Substantive Change according to the type of change being proposed.
4. After reviewing the proposed change, Commission staff will determine whether or not it is indeed substantive.
5. If the proposed change is determined to be substantive, the institution will be required to complete a Substantive Change Proposal.

*Note: When the proposal is determined to be a substantive change please refer to the ACCJC Fee Schedule that each college receives annually for the Substantive Change Fees.*

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**Step Two: Preparing the Substantive Change Proposal**

1. Once the college has established the need to prepare a Substantive Change Proposal, it should follow the "Required Format and Content of the Substantive Change Proposal." Commission staff will assist the college by reviewing draft proposals for completeness and issues that may require further clarification or evidence.
2. When Commission staff has reviewed a draft proposal an invoice for the substantive change review fee will be sent to the college president's office. Payment is due when the final proposal is submitted, 30 days in advance of the Substantive Change Committee's scheduled meeting.
3. The college submits the final proposal with a non-password required live link to an e-copy of the catalog and supporting evidence, including description and analysis.
4. The Substantive Change Proposal must be submitted electronically in Microsoft Word to Commission staff. (Evidence may be submitted in PDF format.)
5. One hard copy of the proposal, including evidence, must be submitted to Commission staff.

**Step Three: Required Format and Content of the Substantive Change Proposal**

*Cover Sheet*

The Cover Sheet must include "Substantive Change Proposal," the title of the substantive change, the name and address of the institution, the date of submission, and the name and title of the individual responsible for preparing the proposal.

*Table of Contents*

The Table of Contents should include page numbers for the body of the proposal and supporting appended documentation of evidence.

**Step Four: The Substantive Change Proposal should include the following content where applicable:**

- A. A concise description of the proposed change and the reasons for it
  1. A clear and concise description of the change
  2. Evidence of a clear relationship to the institution's stated mission
  3. Discussion of the rationale for the change including but not limited to labor market analysis

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- B. A description of the program to be offered if the substantive change involves a new educational program, or change in delivery mode**
1. The educational purposes of the change are clear and appropriate
  2. The proposed program meets Eligibility Requirements, Accreditation Standards and Commission policies related to student learning programs and services and resources
- C. A description of the planning process which led to the request for the change, including:**
1. The change's relationship to the institution's planning, evaluation and stated mission
  2. The assessment of needs and resources which has taken place
  3. The anticipated effect of the proposed change on the institution
  4. A clear statement of the intended benefits that will result from the change
  5. A description of the preparation and planning process for the change, i.e., when did the change go into effect
- D. Evidence that the institution has analyzed and provided for adequate human, physical, technology and financial resources and processes necessary to initiate, maintain, and monitor the change and to assure that the activities undertaken are accomplished with acceptable quality, including:**
1. Adequate and accessible student support services: enumerate services as detailed as possible; provide non-password required electronic links where available
  2. Sufficient and qualified faculty, management, and support staffing
  3. Professional development for faculty and staff to effect and sustain the change
  4. Appropriate equipment and facilities, including adequate control over any off-campus site
  5. Sustainable fiscal resources including the initial and long-term amount and sources of funding for the proposed change and an analysis of fiscal impact on the institution's budget
  6. A comparative analysis of the budget, enrollment and resources; identify new or reallocated funds
  7. A plan for monitoring achievement of the desired outcomes of the proposed change
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8. Evaluation and assessment of student success, retention and completion
- E. Evidence that the institution has received all necessary internal or external approvals, including:**
1. A clear statement of what faculty, administrative, governing board, or regulatory agency approvals are needed, and evidence that they have been obtained
  2. Legal requirements have been met
  3. Governing board action to approve the change and any budget detail supporting the change
- F. Evidence that each Eligibility Requirement will still be fulfilled specifically related to the change**
1. All requirements should be addressed, and requirements that are particularly impacted by the change should be addressed in detail.
- G. Evidence that each Accreditation Standard will still be fulfilled specifically related to the change and that all relevant Commission policies are addressed**
1. All Accreditation Standards should be addressed and those that are particularly impacted by the change should be addressed in detail. There should be a description of the process for monitoring and evaluating the effectiveness and learning outcomes expected through the proposed change.
  2. Depending on the nature of the proposed change, the Commission may ask for more detailed information to assist the staff and the Committee on Substantive Change in their review.
  3. Failure to address Eligibility Requirements, Accreditation Standards and Commission policies could result in the proposal being considered incomplete or rejected and subject to an additional fee(s).

## **4.3 Committee on Substantive Change**

### **4.3.1 Substantive Change Review Process**

The Commission has authorized the Committee on Substantive Change to review proposals and take formal actions on substantive changes. The Committee on Substantive Change may act to:

- approve;
- defer;
- deny the change; or

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- refer the proposed change to the entire Commission for action at either the January or June Commission meeting.

The Committee may also request additional information about the change or visit the institution prior to taking any action. In addition, the Committee may require a resubmission or a Follow-Up Report on the substantive change.

When the Committee makes a determination regarding a substantive change, the Commission communicates the decision to the institution via a formal letter within 30 days of the decision and to the entire Commission at the next regular meeting.

If a substantive change is denied, the letter will include reasons for the denial. In the event that the change is judged to have the potential to affect the institution broadly, the review process may be expanded to include the institution as a whole.

#### **4.3.2 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.

#### **4.3.3 Visits**

- Under federal requirements of recognized accrediting agencies, the Commission must visit a new location within six months of the start of operations.
- The Commission must visit additional locations that offer 50% or more of a program to verify that the personnel, facilities, and resources claimed at the time of the Substantive Change Proposal are present.
- Institutions undergoing changes in ownership, control, and/or legal status are visited within six months of the implementation of the change.
- If the institution is not due for an external evaluation within two years of the approval of the substantive change, an on-site evaluation or other review may be required by the Commission.
- The Commission may also choose to visit additional locations, for example, when there is rapid growth in the number of such locations.

The visit will be conducted by one of the following: A member or members of the Commission staff; a member of the Commission staff and a member of the Committee on Substantive Change or other Commissioner, a member of Commission staff and a programmatic expert from a member institution. The size of the visiting team will be a function of the complexity and size of the site and proposed change. The staff member will serve as chair of the team. The visiting team will focus on the content of the original Substantive Change Proposal and any updated information

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requested by Commission staff prior to the visit, as well as any stated concerns of the Committee on Substantive Change.

A draft report of the substantive change visit will be presented to the institution for any corrections of fact. A final visit report will be submitted to the institution, filed with the institution's ACCJC records and reported to the Commission at its next meeting.

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

#### 4.3.4 Institutional Follow-Up

- The Commission may require institutions to submit Follow-Up 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. These reports may be followed by a visit of Commission representatives.
- While not ideal, should a substantive change review already be in progress in close proximity to the preparation of the Self Evaluation Report for Educational Quality and Institutional Effectiveness (Institutional Self Evaluation Report), the college should then include a description of the change and its status with the review (e.g., whether the Substantive Change Proposal is in draft form or under consideration by the Commission but not yet approved).
- Institutions should include updates of approved substantive changes in their next Institutional Self Evaluation and Midterm reports.

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## 5 Elements for Inclusion in Selected Substantive Changes

### 5.1 New Campus or Additional Location

1. Projected date of the start of operations at the additional location
2. Address and distance from main campus; transportation available for students
3. Evidence of need for the additional location
4. Description of how outcomes of the need will be assessed
5. Evidence that the institution will maintain sufficient control of the location to guarantee that it meets Eligibility Requirements, Accreditation Standards and Commission policies
6. Evidence of official approval by the governing board
7. Evidence that the location will be ready to begin operation at the time of the substantive change approval
8. Evidence of sufficient fiscal and physical resources to support and sustain the additional location and an analysis of fiscal impact on the institution's budget
9. Description of how the college will identify and evaluate specific needs for services and resources of students at the additional location
10. Description of support services and learning resources available at the location
11. Description of how students will access services and resources if students are to rely on those services and resources at the main campus
12. Evidence of sufficient and qualified staff at the location, and description of processes for hiring and evaluating such staff
13. Description of the process for creating and revising curriculum for the location
14. Description of how programs at the location will be evaluated, including the achievement and assessment of student learning outcomes (SLOs)
15. Description of the involvement of staff and students at the additional location in institutional planning and decision-making, and their connectedness with the main campus

#### 5.1.1 Suggested Documentation for a New Campus or Additional Location

1. Copy of the lease and/or floor plans

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2. Operating budget and analysis of substantive change financial resources as they relate to the college budget and sustainability of the location
  3. Pages from the class schedule indicating the address and classes offered at the location
  4. Map showing main campus and additional location
  5. Minutes of governing board meeting showing action to approve the additional location
  6. Organizational chart showing management structure for the additional location

## 5.2 New Educational Program

1. Evidence that the new program is within the scope of the institutional mission
2. Description of the analysis undertaken to determine need for the new program
3. Evidence of official approval by the governing board
4. Evidence of sufficient fiscal and physical resources to support and sustain the new program and an analysis of fiscal impact on the institution's budget as well as plans for sustainability
5. Evidence that the program is designed to meet student needs
6. Description of how outcomes of the needs will be assessed
7. Description of how the program will be reviewed compared with other programs, including the achievement, assessment, and improvement of student learning outcomes (SLOs) and achievement
8. Description of how expertise in this new field is to be acquired in order for a quality curriculum to be developed
9. Evidence of sufficient and qualified staff for the program; description of processes for hiring and evaluating staff
10. Description of the process for creating and revising curriculum for the program
11. Description of program course requirements
12. Description of student support services for the program
13. List of prerequisites and admission requirements
14. Evidence of labor market analysis that includes wage/salary data and opportunities for employment

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**5.2.1 For a New Educational Program, some Questions to Assist in Determining if Changes in Courses or Programs Constitute “Significant Departure”**

1. Does the college mission statement need to be changed to include the proposed program?
2. Does the college have the financial resources to implement and sustain the program?
3. Does the college need to acquire, build, or modify facilities in order to accommodate the proposed program?
4. Does the college need to acquire new equipment for the new program?
5. Does the college need to arrange for outside clinical experience or apprenticeships for the program?
6. How much of the existing curriculum will be included in the proposed program?
7. How will the new curriculum differ from existing curriculum in terms of level, content, length, rigor, and credit? Will new prerequisite courses need to be added to the curriculum?
8. How will existing general education requirements be sustained as required by the Eligibility Requirements, Accreditation Standards and Commission policies?
9. How will the college meet the need to hire faculty with expertise not found within the current faculty membership should the number of faculty be increased?
10. How will learning resources be augmented to support the program?
11. What student support services will need to be added or adjusted?
12. How will the new program impact college enrollment?
13. Has the college planned for program growth?

**5.2.2 Suggested Documentation for New Educational Program**

1. Pages from the catalog, if appropriate
2. Course outlines; student learning outcomes/assessment
3. Chronology of development of the substantive change
4. Budget for the change, integration with college budget, plans for sustainability
5. Job descriptions showing qualifications for program faculty

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6. If the new program is a conversion from face-to-face program to an online program, submit the most recent program review
  7. Organizational chart showing management structure for the new educational program

### 5.3 New Instructional Delivery Mode

1. A list of programs, degrees and certificates offered in the new delivery mode
2. Description of the analysis undertaken to determine need for the new instructional delivery mode
3. Most recent program review if change is conversion from face-to-face program to an online program
4. Evidence of student success and achievement data; comparability with face-to-face delivery student success and student achievement data
5. Evidence of official approval by the governing board
6. Evidence of sufficient fiscal and physical resources to support and sustain the new delivery mode and an analysis of fiscal impact on the institution's budget
7. Evidence that delivery systems and modes of instruction are designed to, and do in fact, meet student needs
8. Evidence that student readiness has been addressed
9. Description of how outcomes of the need will be assessed and evaluated
10. Description of how effectiveness, including SLOs and assessment of the delivery mode will be evaluated; how the delivery mode will be reviewed compared with other modes of instruction
11. Evidence that DE/CE student attendance in courses/programs is monitored
12. Evidence of a policy that defines "regular and substantive interaction" (34 C.F.R. § 602.3.)
13. Evidence of policies that dictate satisfactory progress in DE/CE courses and programs
14. Evidence that the college prepares and monitors DE/CE students to be successful
15. Evidence that data has been analyzed for DE/CE and face-to-face students in order to compare student achievement and attainment of expected learning outcomes

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16. Evidence that proctored sites for DE/CE examinations are approved
  17. Evidence that student support services, i.e. counseling, tutoring, etc., are comparable to face-to-face services
  18. Description of faculty support for the mode of delivery
  19. Description of faculty training implementation that includes content, pedagogy, and instructional technology
  20. Plan for equipment acquisition and maintenance
  21. Description of how delivery mode is considered in curriculum development process
  22. Evaluation of marketing efforts and evidence of their integrity
  23. Evaluation of information provided to students regarding the new delivery mode (e.g., equipment requirements; convenient access to help desk)
  24. Description of college accommodations for students in distance learning courses when required to come to campus
  25. Describe laboratories and other performance based instructional environments
  26. Evidence of growth projections and planning for sustainability, including student support services, for the next 2-5 years
  27. Organizational chart showing management structure for the new delivery mode
  28. Adherence to state authorization regulations if appropriate

### **5.3.1 Considerations for Distance Education Programs**

#### **Growth Projections**

- Recent history (2-5 year span) of distance learning on the campus
- Increase in the number of courses offered online
- Increase in the number of faculty teaching online courses
- Increase in the number of students taking online courses

#### **Increasing Expectations**

Institutional processes that impact student access and completion of online programs:

- Admissions
- Orientation
- Registration

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- Advising
  - Financial aid
  - Course delivery
  - Communication with students
  - Tutoring services
  - Graduation applications
  - Transcript requests
  - Student survey collection and analysis

#### **Student Success/Student Achievement Data**

- Class size
- Student retention and withdrawal rates/data
- Student course completion rates/data
- Online pass rate compared with face-to-face pass rate
- Student learning outcomes data and assessment
- Use of student data collection and analysis for improvement

#### **Quality Assurances**

- Academic integrity; course content between online and face-to-face courses
- Faculty online teaching capability
- Student capability for online instruction
- Faculty and student support services
- Faculty and student learning assessment systems
- Integration with institutional mission
- Student authentication
- Faculty resources
- Technical support
- Evaluation of faculty, course and program effectiveness and quality

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# Appendices

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# Appendix A

ACCREDITING COMMISSION FOR COMMUNITY AND JUNIOR COLLEGES  
Western Association of Schools and Colleges

## 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)*

### 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 required of decision-making bodies by the U.S. Department of Education.<sup>1</sup>

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. 34 C.F.R. § 602.22.

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 quality and institutional effectiveness review (formerly comprehensive review) or site visit is required to make a determination regarding the substantive change<sup>2</sup>. Situations which may trigger this determination include:

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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(a)(3)

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- 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 a branch campus to a 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;
  - lack of effective educational policies and practices;
  - 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 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 creditable institution
- a reduction of programs to an extent that the institution's mission cannot be accomplished

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## Change in the Nature of the Constituency Served

- a change in the intended student population
- closure of an institution
- 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:

- 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; 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

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- a merger with another institution<sup>3</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

### **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

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<sup>3</sup> See also Policy on Contractual Relationships with Non-Regionally Accredited Organizations

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## **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).

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## Appendix B

### Brief Descriptions of Selected Policies

The Commission policies summarized below are particularly relevant to specific types of substantive changes such as conducting courses through new distance learning modes, contracting with other agencies for the delivery of educational programs, sharing functions with a related entity, and closing programs or colleges. These and other relevant policies are found in the *Accreditation Reference Handbook*.

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.

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.

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. It addresses change of ownership and details the specific information that is needed in addition to substantive change or other policies.

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.

The “Policy on Interregional Policies on the Accreditation of Institutions Operating Across Regions” includes policies based upon the premises that the home region should be demonstrably accountable for its accreditation decisions affecting institutions operating in host regions and that the host region has a legitimate interest in the quality of institutions from other regions operating within its jurisdiction. These policies address the evaluation and procedures for accreditation of institutions operating interregionally.