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. The U.S. Department of Education (ED) 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 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 scope of an institution’s accreditation covers all activities conducted in its name.

ACCJC, through its Substantive Change Committee and processes, ensures that institutions continue to meet the Eligibility Requirements, Accreditation Standards, and Commission policies. 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, Accreditation 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 Substantive Change Committee prior to implementation (34 CFR § 602.22). The Committee will not approve a substantive change to be effective on a date prior to its action on the substantive change. The approval date of a substantive change application will be the date of the action letter to the institution indicating approval by the Substantive Change Committee.
1. Changes the Commission Considers Substantive CHANGE

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

- Substantive change in the mission or objectives of the institution or its programs; if the mission or objectives 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 has been 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.

- 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 ED approval to offer federal financial aid 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:

  o The institution must have the fiscal and administrative capacity to operate the additional location. If required by federal regulations, 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.

1 Please note that although some change at an institution may not warrant substantive change review, the institution should still take all necessary steps to ensure the Eligibility Requirements, Accreditation Standards, and Commission policies related to that change are being met.
New international locations at which 50% or more of at least one program will be offered require approval 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 and Policy on Principles of Good Practice in Overseas International Education Programs for Non-U.S. Nationals).

- 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.²

- Closure of a permanent location geographically apart from the main campus at which students can complete at least 50% of an educational program.

- 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 control³ until the institution demonstrates that it meets the conditions for the Commission to pre-approve additional locations.⁴

- Institutions which have successfully completed at least one cycle of accreditation and have received approval for the addition of at least two additional locations, do not need prior approval for substantive change; institutions must report the changes to ACCJC within 30 days if they have met criteria indicating sufficient capacity and control.

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.⁵

- 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, or change of an accredited institution into an off-campus site or branch campus (withdrawal of accreditation).

- 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.

² See the Policy on Closing an Institution for further discussion of requirements related to closing an institution and Policy on Teach-out Plans and Agreements for institutional or programmatic closures.

³ as defined in 34 CFR § 600.3.1

⁴ 34 CFR § 602.22(a)(2)(viii)(D)

⁵ See also Policy on Contractual Relationships with Non-Accredited Organizations
1.5 Change in Programs or their Mode of Delivery that Represents a Significant Departure from Current Practice

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

- 50% or more of a program(s) offered at a new or different permanent location.
- 50% or more of a program(s) offered 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 or correspondence education offered as a new modality (for the first time that an institution offers instruction for 50% or more of a program);
  - New distance education or correspondence education programs, if the college has not submitted and received approval on at least one distance education or correspondence education 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.
  - Short-term programs, which qualify for the Direct Loan program only. This type of program must provide at least 300 but less than 600 clock hours of instruction offered during a minimum of 10 weeks of instruction.\(^6\)

Institutions may make changes that are not considered a significant departure from existing practices or programs. Changes that are generally considered as not substantive, however, do require review and administrative approval by ACCJC through the substantive change inquiry form (https://accjc.org/forms/substantive-change-inquiry-form/) to ensure that student access to federal financial aid is assured. The following changes are not considered significant departures for Substantive Change Purposes:

\(^6\) See 2019-2020 FSA Handbook Volume II, section 2-23 for more information
• 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 or programs offered at correctional facilities.

• 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 or correspondence education programs, if the college has received approval on at least one distance education or correspondence education substantive change application.

1.6 Change in Credit Awarded

• Change in the way an institution measures student progress, including whether the institution measures progress in clock hours, semesters, trimesters, or quarters, or uses time-based or non-time based methods.

• Substantial increase or decrease in the number of clock or credit hours awarded, or an increase in the level of credential awarded, for the successful completion of one or more programs.

1.7 Implementation of Direct Assessment

• Change of an instructional program from clock hours or credit hours, to direct assessment of student learning. This includes programs using a hybrid approach.
  
  o A program must obtain ED approval as a direct assessment program for the first program it is offered (including hybrid programs) to be eligible for Title IV funding. Subsequent programs from the same institution will not require the Department approval for Title IV funding.  

1.8 Implementation of a Baccalaureate Degree Program

• Addition of an instructional program that leads to the award of a baccalaureate degree.

• Addition of an area of emphasis within a baccalaureate degree program of study.

• Designation of a minor which can be awarded in association with a baccalaureate degree.

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7 See the Policy on Competency Based Education

8 See 34 CFR § 668.10

9 See the Policy on Accreditation of Baccalaureate Degrees for specific standards and policies that must be addressed, as well as additional specific evaluation criteria.
1.9 **Contractual Relationship with a Non-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.\(^\text{10}\)

1.10 **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.

\(^{10}\) 34 CFR § 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 ACCJC 30 days prior to the scheduled meeting of the Substantive Change Committee.** Substantive Change Committee meeting dates are posted on the ACCJC website ([ACCJC.org](http://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: Determining 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 on ACCJC’s website at: https://accjc.org/forms/substantive-change-inquiry-form/.

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 needs to submit an 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. ACCJC staff will provide the college’s ALO with the appropriate Substantive Change Application Form.

- 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 ACCJC.

- 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 of the program.

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 30 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.
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. ACCJC Staff and the Substantive Change Committee reserve the right to defer any application that is incomplete. The preliminary review is designed to assist institutions in avoiding a denial or deferral of the application.

Review by the Substantive Change Committee

The Substantive Change Committee will review as many Substantive Change Applications as possible at a meeting. Applications that are unable to be reviewed will be scheduled for the next regular meeting of the Committee.

3.4 Step 4: Receive Notification of Action from ACCJC

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

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

2. **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 Substantive Change Committee will review any follow-up report(s).

3. **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 that 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.

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

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

6. **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 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: Site Visit Requirements for Substantive Change Approvals**

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, and 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 that 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. Site visits may be performed virtually (via video conference) at the discretion of ACCJC. Substantive Change visiting teams consist of peer 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 Substantive Change Committee.

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.
Appendices
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 Institutional Degrees and Credits” details the requirements and expectations for awarding degrees and credits 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 Teach-Out Plans and Agreements” includes definitions of teach-out, teach-out plans, and teach-out agreements, and outlines when each would be required, and the process for the Commission’s review. Access the policy here.

- The “Policy on Competency Based Education” provides a definition of competency based education, federally recognized approaches to competency based education, Title IV requirements, and the Commission’s responsibility for ensuring direct assessment programs are eligible for Title IV funds. Access the policy here.

- The “Policy on Contractual Relationships with Non-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 “Policy on Accreditation of Baccalaureate Degrees” provides guidance to colleges that wish to apply for authorization to offer a Baccalaureate Degree through the Substantive Change process. Access the policy here.
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 (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.