

## NWCCU POLICIES | SUBSTANTIVE CHANGE POLICY

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The Northwest Commission on Colleges and Universities monitors proposed changes whenever an accredited or candidate institution plans a substantive change in its mission and core themes, scope, ownership or control, area served, or other significant matters. These changes have impact on the resources and capacity of the institution. The Commission defines these changes as major changes or minor changes.

A **Major Change** has significant impact on the resources and capacity of the institution. A major change is of a magnitude to alter an institution's mission, objectives, and supporting core themes; the scope or degree level of its offerings; its autonomy, sponsorship, or the locus of control; its offering of academic programs for credit through contractual relationships with external organizations; its offering of programs for credit outside the NWCCU region; or, its campus locations including a branch campus or the establishment of an additional location apart from the main campus at which the institution offers at least 50 percent of an educational program.

A **Minor Change** has minimal impact on the resources and capacity of the institution. Most changes, such as adding programs that are allied with existing offerings, or dropping programs, and changes in method of instructional delivery, are not major and therefore are categorized as minor changes.

While the decision to make changes is an institutional prerogative and responsibility, the Commission monitors the effect of a change on the validity of the institution's accreditation status with the Commission. Accreditation or candidacy for accreditation of an institution applies to those units, programs, and other institutional activities which were included in the institutional comprehensive self-evaluation report and were reviewed by an evaluation committee as required by the Northwest Commission on Colleges and Universities. Substantive changes (major or minor) initiated subsequent to the most recent institutional evaluation are not automatically included in the institution's accredited or candidate status, and must therefore be submitted as change proposals to the Commission for review. Insofar as institutions are in a continual process of change, the Commission continuously monitors institutions through its Substantive Change Policy.

Although the scope and depth of information to be provided in the change proposal will depend upon the nature of the proposed change, **responses to the following are required:**

- a. Mission and Core Themes:
  1. clear statement of the nature and purposes of the change in the context of institutional mission and core themes.
- b. Authorization:
  1. evidence of the date of formal approval by the governing board and by the appropriate governmental agency to offer the proposed existing and/or new program(s) at the proposed site(s). If the institution is located in, or operates in, a state that has only minimal requirements for chartering, but also a higher level of authorization to grant degrees, date and evidence of approval at the higher level is required.

- c. Educational Offerings:
  1. descriptive information of the educational offering(s) including credits to completion, courses by title and assigned academic credit granted;
  2. descriptive information regarding method of instructional delivery (i.e., type of delivery including percent of face-to-face, hybrid, distance delivery, and/or competency-based);
  3. description of expected student learning outcomes;
  4. description of the assessment plan for student learning outcomes;
  5. evidence of approval by the appropriate academic policy body of the institution.
- d. Planning:
  1. plans and descriptive materials indicating evidence of need for the change and the student clientele to be served (common resources include EMSI and the BLS Handbook);
  2. procedures used in arriving at the decision to change;
  3. organizational arrangements required within the institution to accommodate the change including administrative, staff, and faculty hires, facilities, student services, library; and
  4. timetable for implementation.
- e. Student Services: capacity of student services to accommodate the change; and implications of the change for services to the rest of the student body;
- f. Physical Facilities and Equipment: provision for physical facilities and equipment;
- g. Library and Information Resources: adequacy and availability of library and information resources;
- h. Faculty: analysis of the faculty and staff needed which includes educational and professional experience qualifications of the faculty members relative to their individual teaching assignments; and anticipated sources or plans to secure qualified faculty and staff.
- i. Budget:
  1. revenue and expenditures at the program or department level one year prior to the change (if applicable);
  2. projections of revenue and expenditures at the program or department level for each of the first three years of operation;
  3. designated revenue and expenditures associated with the change itself;
  4. institutional financial support to be reallocated to accommodate the change; and
  5. budgetary and financial implications of the change for the entire institution.

Changes categorized as **Major Change** should include a copy of the institution's most recent Integrated Postsecondary Education Data System (IPEDS) finances survey.

When an institution seeks approval to establish a **branch campus or additional location where 50 percent or more of a program is offered**, the proposal must include a thorough response to each of *i.1 through i.5* above and formatted within a business plan, to assist in an evaluation of the institution's fiscal and administrative capacity to operate the additional location as required by United States Code of Federal Regulations (CFR), Title 34, CFR 602.22(c) and 34 CFR 602.24(a). Revenues and expenditures must include a cash flow analysis. The business plan must also address the educational program and the operation, management, and the physical resources at the branch campus.

Following approval of a substantive (major or minor) change, the Commission may conduct follow-up oversight of the change. The nature of the oversight is determined by the nature of the change. Approved substantive (major or minor) change proposals are included under the accreditation of the institution, subject to the conditions of oversight.

The Northwest Commission on Colleges and Universities relies upon the staff of the Commission to determine if a proposed change is a **major change** or a **minor change**. Careful consideration is necessary in deciding if an institutional change is major. Size, complexity, maturity, financial health, and experiences of the institution in effecting significant change are important factors. Usually, it is possible for the President of the Commission to determine whether a change proposed by an institution is a **major change** or a **minor change**. If the institution disagrees with the decision of the President regarding the significance of the change, the matter of categorization may be referred to the Executive Committee of the Commission for reconsideration.

When considering a change included in this policy, an institution may communicate with the Commission staff early in its deliberations. Early communication enables the staff to provide information and advice regarding the effect of the proposed change on the accreditation or candidate status of the institution and the procedures to be followed in seeking approval.

Changes in candidate or accredited institutions must be reported to the Commission and approved in advance of implementation.

If an institution implements a change without prior written notice or if it proceeds to implement a substantive change denied by the Executive Committee or Commission, the Commission may issue an order for the institution to show cause as to why its accreditation or candidate status should not be terminated.

Although the NWCCU Annual Report does request a listing of both implemented and future planned changes for each institution, the NWCCU Annual Report is not an appropriate vehicle for notifying the Commission of major or minor substantive changes.

## Procedure for Minor Changes

1. **Proposal Submission.** The purpose of a proposal is to enable the institution to set forth the activities constituting the change and the impact expected on the institution as a whole. The Commission requests online submission of proposals for all changes.
  - a. The Accreditation Liaison Officer (ALO) is required to complete and submit the online Minor Change Proposal through the link found on the NWCCU website.
  - b. The proposal contains brief responses to sections *a* through *i* of the NWCCU Substantive Change Policy, including the institution's proposed implementation date, date of institutional governing board approval, and date of faculty review.
  - c. Proposals may be submitted at any time of year. Expedited Review may be requested by the institution and granted at the discretion of the Commission.
2. **Review.** Commission staff review the minor change proposal and determine the nature of change.
  - a. If the change is judged to be consistent with the institution's existing accreditation, the institution is notified in writing that the proposed change is included under the existing accreditation of the institution.
  - b. The effective date of the approval of the minor change is the date of the notification letter unless otherwise specified by the Commission.

- c. The Commission establishes appropriate follow-up oversight of minor changes.
- d. The minor change proposal is then noted as an information item on the agenda for the Executive Committee's next regularly scheduled meeting.

## Procedure for Major Changes

1. **Proposal Submission.** The purpose of a proposal is to enable the institution to set forth the activities constituting the change and the impact expected on the institution as a whole. The Commission requests online submission of proposals for all changes.
  - a. The Accreditation Liaison Officer (ALO) is required to complete and submit the online Major Change Proposal through the link found on the NWCCU website.
  - b. The proposal contains thorough responses to sections *a* through *i* of the NWCCU Substantive Change Policy, including the institution's proposed implementation date, date of institutional governing board approval, date of faculty review, and, depending upon the nature of the change, any additional supporting materials.
  - c. Proposals may be submitted at any time of the year. Expedited Review may be requested by the institution and granted at the discretion of the Commission.
2. **Review.** The Commission staff will review the proposal and request any further information that is needed.
  - a. The Commission assigns a Major Change Review Panel, as appropriate, to review and to take action on the proposal.
  - b. The Major Change Review Panel consists of a current Commissioner serving as Chair and two to four additional members chosen based on knowledge and expertise, regional location, and affiliation with a public or private institution. The composition of the Major Change Review Panel is consistent with the Commission's philosophy of peer-evaluation of member institutions.
  - c. Following receipt of a major change proposal, Commission staff prepare an analysis of the proposal and sends the analysis with a copy of the proposal to members of a Major Change Review Panel.
  - d. On behalf of the Commission, the Major Change Review Panel considers the impact of the proposed change on existing institutional programs, resources, and services and judges whether it is reasonable to expect that the Commission's accreditation criteria will continue to be met.
  - e. The Major Change Review Panel may take one of the following actions:
    - Accept the proposal without conditions;
    - Accept the proposal with conditions;
    - Defer action pending the receipt of additional information;
    - Defer action and refer the proposal to the Executive Committee of the Commission with a recommendation for action at its next regularly scheduled meeting.
  - f. The Major Change Review Panel communicates its action to the President of the Commission.

If the proposal is approved by all members of the Major Change Review Panel, the institution is notified in writing to proceed with the change which is noted in the institution's accreditation. The effective date of approval of the change, which is not retroactive, is the date of the notification letter unless otherwise specified by the Commission. In the case of change of ownership, the Commission may

designate the date of the change of ownership as the effective date of approval if the accreditation decision was made within 30 days of the change of ownership. The proposal is then noted as an information item on the agenda for the Commission's next regularly scheduled meeting. Also, if one or more of the members of a Major Change Review Panel recommend that the proposal be denied, the proposal is put on the agenda of the next regularly scheduled meeting of the Executive Committee for review and action. If the Major Change Review Panel recommends deferring action and referring the proposal to the Executive Committee, the proposal is put on the agenda for the next regularly scheduled meeting of the Executive Committee for review and action.

**Review of the Proposal by the Executive Committee.** The Executive Committee meets twice per year. If a major change proposal is put on the agenda of an Executive Committee meeting and considered by the Executive Committee acting on behalf of the Commission, one of the following actions will be taken:

- accept the proposal without conditions;
- accept the proposal with conditions;
- deny approval of the proposal;
- defer action pending the receipt of additional information;
- defer action and refer the proposal to the Commission at its next regularly scheduled meeting; or
- request that a new Major Change Review Panel consider the proposal.

The Executive Committee communicates its action to the President of the Commission. The President notifies the institution's chief executive officer in writing of the action taken by the Executive Committee. If the proposal is approved, follow-up actions, if any, are determined by the nature of the change and any other factors deemed appropriate by the Executive Committee. If the proposal is denied, the reasons for the denial are specified in the written notification within 30 days of closure of the regularly scheduled meeting of the Executive Committee.

**Request for Reconsideration of Executive Committee Action.** If the major change is denied by the Executive Committee, the institution may request consideration by the Commission by way of communication in writing within 30 days of the date of notification of the Executive Committee's denial of the change.

**Review of the Proposal by the Commission.** The Commission meets twice per year. If a major change proposal is put on the agenda of the next regularly scheduled meeting and considered by the Commission, one of the following actions will be taken:

- accept the proposal without conditions;
- accept the proposal with conditions; or
- deny approval of the proposal.

The institution's chief executive officer is notified in writing of the action taken by the Commission and the reasons for the action. If the proposal is approved, follow-up actions, if any, are determined by the nature of the change and any other factors deemed appropriate by the Commission. If the proposal is denied, the reasons for the denial are specified in written notification within 30 days of closure of the regularly scheduled meeting of the Commission. If the proposal is denied approval by the Commission, the Commission's decision is final and cannot be appealed.

**Follow-up Actions.** Follow-up Actions are determined by the nature of the change and may include

further reporting and an on-site evaluation (subject to the conditions for follow-up oversight in Appendix A).

**On-site Evaluations.** The size and composition of the on-site evaluation committee will depend on the nature of the change. The dates for the on-site evaluation are set by Commission staff in consultation with appropriate institutional officials.

**Report.** Prior to the substantive change evaluation visit, the institution will prepare and submit a concise report that assesses the effect of the change. The report need not repeat material submitted in the change proposal but should provide evidence and analysis of:

- a. effects of the change on the total institution;
- b. desirable revisions in the change based on the first year's experience;
- c. new program(s) not previously approved or existing program(s) offered at a new location(s),
  1. adequacy of administrative, faculty, financial, library, and facilities support for the program's objectives;
  2. evidence of the program's effectiveness;
  3. plans for continuing assessment of the effectiveness of the change; and
  4. impact of the change on the institution as a whole.

**Resubmission of a Proposal.** Institutions may resubmit a significantly revised Major Change Proposal for a new review at least three months beyond the notification date of denial.

## Appendix A: Conditions for Follow-Up Oversight

**Accreditation and Candidacy at a New Degree Level.** If approval is given to offer a program at a degree level not previously approved and listed for the institution in the Commission's Directory, the institution is granted *candidacy* at the new degree level while retaining accreditation at the previously approved degree level(s).

*Candidacy.* When an institution is granted candidacy status at a new degree level, it is expected to host an evaluator(s) dedicated to the review of the new degree level at the next scheduled report, with a visit, in the seven-year process of accreditation. The policies and procedures for evaluations as listed on the Commission's website will apply, and the action taken by the Commission following such evaluation will apply to the accreditation of the institution as a whole, not merely to the programs at the new degree level. The effective date of accreditation at the new degree level is September 1 of the academic year immediately preceding the academic year in which the evaluation took place.

**Branch Campus.** U.S. Department of Education regulations require an evaluation visit within six months following approval for the establishment of a branch campus by an institution. (34 CFR 602.24(a) (3))

**Additional Locations.** U.S. Department of Education regulations require an evaluation visit within six months following approval for the establishment of an additional location geographically apart from the main campus at which the institution offers at least 50 percent of an educational program. (34 CFR (c)). The Commission must determine if the institution has the fiscal and administrative capacity to operate the additional location. In addition, the Commission will visit within six months, each additional location the institution establishes, if the institution:

- (i) has a total of three or fewer additional locations;
- (ii) has not demonstrated, to the Commission's satisfaction, that it has a proven record of effective educational oversight of additional locations;
- (iii) has been placed on warning, probation, or show cause by the Commission or is subject to some limitation by the Commission on its accreditation or preaccreditation status;
- (iv) adds a location abroad, regardless of the number of domestic additional locations, unless waived by staff.

The purpose of the visits to additional locations is to verify that the additional location has the personnel, facilities, and resources it claimed to have in its proposal to the Commission for approval of the additional location.

The Commission will conduct, at reasonable intervals, visits to additional locations of institutions that operate more than three additional locations. When an institution initiates its fourth off-campus site/location, the Commission may, at its discretion, authorize a site visit to review one or more of these additional locations. The Commission, however, may require visits to a representative sample of sites between scheduled reaffirmations, if (1) the additional sites have been initiated since the last scheduled reaffirmation, and (2) the sites have not been visited.

**Rapid Growth.** The Commission may, at its discretion, conduct visits to additional locations, to ensure that accredited and pre-accredited institutions maintain educational quality when experiencing rapid growth in the number of additional locations. Institutions contemplating rapid growth (or uncertain as to whether planned changes fall under this category) should be in contact with the Commission staff prior to submitting information to the Commission.

**Change of Ownership.** U.S. Department of Education regulations require an evaluation visit within six months following approval for change in legal status, sponsorship, form of control, or ownership of the institution including merger with another institution. (34 CFR 602.24(b))

**Other Substantive Changes.** For all other kinds of changes, the Commission may, as a condition of approval, request follow-up oversight, including the scheduling and conduct of an on-site evaluation. The nature of the change will determine the scope of any follow-up evaluation.

## Appendix B: Examples of Major and Minor Changes

**Minor changes** include, but are not limited to, the following:

- a. Adding existing program(s) of one year (or more) in length to a previously reported and evaluated location where 50% or more of the program requirements are delivered (assuming minimal need for additional resources);
- b. Adding a degree or certificate program using Competency-Based Education delivery where Competency-Based Education delivery is previously reported and evaluated;
- c. Adding a site or location in geographic proximity to the institution's main campus (within 20 miles);
- d. Adding a new degree program in the same level of accreditation and closely related to fields of study previously reported and evaluated; and/or
- e. Placing in moratorium, suspending, or terminating a degree program of 30 semester or 45 quarter credits in length.

**Major changes** include, but are not limited to, the following:

- a. Changing institutional mission, objectives, and core themes;
- b. Changing legal status, form of control, ownership, or sponsorship of the institution<sup>1</sup>;
- c. Adding courses or a degree program at a new degree level not listed for the institution with the NWCCU\*;
- d. Establishing a branch campus<sup>1†</sup>;
- e. Acquiring, or merging with, another institution/organization, program or location of another institution;
- f. Adding courses/program(s) for academic credit outside the NWCCU region;
- g. Entering into a contractual agreement with a regionally accredited or non-regionally accredited organization to provide courses and program(s) for academic credit on behalf of the candidate or accredited member institution;
- h. Adding program(s) for academic credit within the NWCCU region in a legal jurisdiction not previously reported and evaluated;
- i. Establishing an additional location geographically apart (more than 20 miles) from the main campus at which the institution offers at least 50 percent of an education program (see Appendix A: Conditions for Follow-Up Oversight);
- j. Adding courses or programs that represent a significant departure from existing offerings of education programs or a significant departure in method of delivery from those that were previously reported and evaluated;
- k. First time use of a distance delivery infrastructure, or, offering 50% or more to completion of program requirements by distance delivery;
- l. First time offering of Competency-Based (or direct assessment) Education Programs<sup>2</sup>;
- m. Adding programs delivered through direct assessment or delivered through a "hybrid" direct assessment approach where not previously reported and evaluated<sup>2,3</sup>;
- n. Changing from clock hours to credit hours or vice versa, or a substantial increase or decrease in the length of a program or the number of clock or credit hours awarded for successful completion of a program; and/or
- o. Adding a permanent location at a site at which the institution is conducting a teach-out for students of another institution that has ceased operating before all students have completed their program of study.

<sup>1</sup>On-site visit required within six months.

<sup>2</sup>Additional information may be found in the “Common Framework for Defining and Approving Competency-Based Education Programs” document located on the NWCCU website.

<sup>3</sup>The “hybrid” direct assessment approach combines the course-based approach granting credit hours and an approach through the direct assessment of competencies.

\* **Program:** A systematic, usually sequential, grouping of courses forming a considerable part, or all, of the requirements for a degree or credential.

† **Branch Campus:** A location of an institution that is geographically apart and independent of the main campus and (1) is permanent in nature; (2) offers at least 50% of the courses of an educational program leading to a degree, certificate, or other educational credential; (3) has its own faculty and administrative organization; and (4) has its own budgetary and hiring authority.