

# Substantive Change Manual

## **A Guide to Substantive Change**

Published by the Northwest Commission on Colleges and Universities

May 2018

[www.nwccu.org](http://www.nwccu.org)

## Preface

The Northwest Commission on Colleges and Universities (NWCCU) requires prior approval of institutional substantive changes in educational programs, methods of delivery, and organizational mission, status, or form of control. The substantive change process is designed to ensure the consistency of quality of academic programs, and to ensure that institutions undergoing major changes continue to meet the Standards of Accreditation.

In 1994 and 2008, the Higher Education Reauthorization Acts led to a significant number of regulations concerning substantive change. Among the regulations adopted by the U.S. Department of Education were federally mandated site visits to off-campus locations, authentication of students enrolled in distance education (online) programs, and requirements regarding the credit hour.

Under both Commission policy and federal law, certain substantive changes are required to have prior approval, and NWCCU has taken into consideration relevant U.S. Department of Education regulations. The procedures defined in this manual provide guidelines for institutions to demonstrate compliance with these regulations, as well as other NWCCU requirements.

## Table of Contents

<b>Section One: Substantive Change Policy and Procedures</b> .....	<b>4</b>
Introduction to Substantive Change .....	4
Overview of NWCCU’s Substantive Change Policy .....	5
<i>Substantive Change Categories</i> .....	5
Overview of the NWCCU Commission and the Substantive Change Review Process .....	9
<i>Institutions on Sanction</i> .....	10
<i>Candidate and Newly Accredited Institutions</i> .....	10
Levels of Substantive Change Review .....	10
Categories of Changes .....	12
Minor Changes .....	12
<i>Non-Degree Program Review Requirements</i> .....	13
Major Changes .....	15
Changes Requiring Commission Review .....	22
Noncompliance with Substantive Change Policies .....	22
<b>Section Two: Substantive Change Review Procedures</b> .....	<b>24</b>
Step 1: Determine Whether a Change Requires Notification or a Formal Proposal .....	24
Step 2: Develop the Proposal .....	24
Step 3: Submit Proposal and Fee .....	26
Step 4: The Review .....	26
Step 5: Receive Notification from NWCCU .....	26
Step 6: When Required, Host a Site Visit .....	28
Step 7: Receive Final Approval .....	28
<b>Section Three: Substantive Change Site Visits</b> .....	<b>30</b>
<i>Site Visits</i> .....	30
<i>Pre-Implementation Site Visits</i> .....	31
<i>Post-implementation Site Visits</i> .....	31
<b>Section Four: Appendices</b> .....	<b>33</b>
Appendix 1: Federal Regulations Concerning Substantive Change .....	34
Appendix 2: NWCCU Resources Related to Substantive Change .....	35
Appendix 3: Common Issues in Substantive Change Proposals .....	36

# Section One: Substantive Change Policy and Procedures

---

## Introduction to Substantive Change

### **What is substantive change?**

As described in the *Northwest Commission on Colleges and Universities Substantive Change Policy*, NWCCU monitors proposed changes whenever an accredited or candidate institution plans a substantive change in its academic programs, mission and core themes, scope, ownership, form of control, area served, or other significant matters. These changes, which the Commission defines as either major or minor, have impact on the resources and capacity of the institution.

A minor change has minimal impact on the resources and capacity of the institution. Most minor changes, such as adding programs that are allied with existing offerings, terminating programs, and changes in method of instructional delivery, are categorized as 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 of 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.

### **Why does NWCCU review substantive changes?**

NWCCU is committed to ensuring high quality and to making certain that any changes in educational programs, teaching modalities or locations, scope of offerings, and control of the institution are in keeping with the Standards of Accreditation. In addition, substantive change review procedures are mandated by the U.S. Department of Education. See [Appendix 1](#) for federal regulations governing substantive changes.

### **Do all changes need Commission Approval?**

No. Offering new academic programs or majors, with closely related offerings, simply requires notification to the Commission, provided that the institution has received approval for programs within the new programs/majors area of expertise and degree level. In the case of distance education, the institution must receive Commission approval for the first three programs, but may provide notification for additional distance education programs, provided the additional programs are within the institution's previously approved areas of expertise and degree level. Cancellation or suspension of academic programs are also exempt from Commission approval. However, in each of these cases, the institution must provide notification to the Commission prior to the implementation or discontinuation of the programs or majors.

### **How do I determine if a change requires approval?**

This manual outlines the policy and procedures that govern substantive change. If you are uncertain whether a proposed change requires prior approval, contact NWCCU staff well in advance of implementing the change.

### **How far in advance of my implementation date should I submit a substantive change application?**

For minor changes that require a staff review, institutions are encouraged to submit a minor substantive change proposal and the appropriate fee at least two months prior to the planned implementation date of the change to provide adequate time for review and approval by the Commission. Major changes should be submitted at least six months in advance of planned implementation. Institutions are encouraged to plan accordingly because changes cannot be implemented without NWCCU approval.

### **Who reviews my proposal for a substantive change?**

Proposals are reviewed by the NWCCU staff, members of the Substantive Change Committee who are chosen for their experience in higher education, and Commissioners.

### **Are there some institutional changes that require review beyond substantive change?**

In some cases, the Commission may require a comprehensive institutional review when it deems that changes made or proposed at an institution are of such scope or significance that they would change the fundamental nature or character of the institution. Comprehensive reviews include a self-study leading to an institutional report and an on-site evaluation. Changes that may trigger a comprehensive review include, but are not limited to:

- Rapid growth in new educational programs in any modality;
- Multiple extensive changes to existing educational programs;
- Rapid growth in student enrollments;
- Rapid growth in campuses or off-campus locations for educational program delivery; and/or
- A change of ownership or form of control which may or may not result in a change of mission.

## **Overview of NWCCU's Substantive Change Policy**

The Commission's substantive change policy has been developed to ensure that new programs, modalities, and other important changes are made in keeping with the Standards of Accreditation. This manual outlines the policy in detail. Additionally, a list of NWCCU policies and other resources related to substantive changes is shown in [Appendix 2](#).

Some of the issues that these policies and other resources are designed to address include:

- The overall quality of distance education and off-campus programs;
- Transfer and award of academic credit;
- The overall quality of Competency-Based Education programs; and
- Institutional partnerships with unaccredited entities planning to provide core academic services.

## **Substantive Change Categories**

This table lists the substantive change categories associated with each level of review and indicates if a site visit is required. A substantive change notification form must be submitted for all substantive changes to determine if a review is required.

Change Category	Major or Minor	Level of Review	Site Visit Required?
Adding courses or academic programs including Title IV-eligible degree/certificate/diploma programs that <b>do not</b> represent a significant departure from programs previously approved.	Minor	Notification	No
Suspending, terminating, or placing into moratorium existing Title IV eligible academic programs.	Minor	Notification	No
Closing or suspending for more than one semester or two quarters of an existing additional location or a branch campus	Minor	Notification	No
Combining two programs to create a new program where the two programs have been previously approved.	Minor	Notification	No
Adding courses or academic program(s) including Title IV-eligible certificate programs not related to existing degree program(s), that represent a significant departure (25% difference in program core) from program(s) previously approved <sup>1,2</sup>	Minor	Staff review	No
Initiating or expanding of distance education delivery where 50% or more of the courses or credits in an academic program are provided using distance delivery <sup>3, 5</sup> (First three programs only- then submit notification)	Minor	Staff review	No
Substantially increasing the number of clock or credit hours awarded for successful completion of a program (more than 25% of total program credits or clock hours)	Minor	Staff Review	No
Establishing an additional location where 50% or more of a program's requirements can be earned via face-to-face instructional delivery. <sup>5</sup>	Minor	Staff Review	Post-implementation visit may be required
Dual degree program by consortium agreement <sup>6</sup> <ul style="list-style-type: none"> <li>• Entering into a consortial agreement under which an institution accredited by an accreditor recognized by the U.S. Department of Education provides a significant portion of the academic program <ul style="list-style-type: none"> <li>a. 24% or less of credits in degree or certificate program delivered by consortium partners</li> <li>b. 25-50% of one or more of the institution's education programs provided by the consortium or other accredited institution</li> <li>c. More than 50% of one or more of the institution's educational programs provided by the consortium or other accredited institution</li> </ul> </li> </ul>	Minor	<ul style="list-style-type: none"> <li>a. No requirement</li> <li>b. Notification</li> <li>c. Staff Review<sup>2</sup></li> </ul>	No
Initiating or expanding Competency-Based Education (CBE) delivery where 50% or more of the courses or credits in an academic program are provided using CBE (or direct assessment) learning. (First three programs: 1 <sup>st</sup> program Panel Review; 2 <sup>nd</sup> and 3 <sup>rd</sup> programs Staff Review) <sup>2,4,5</sup>	Major	Panel Review and Staff Review	No

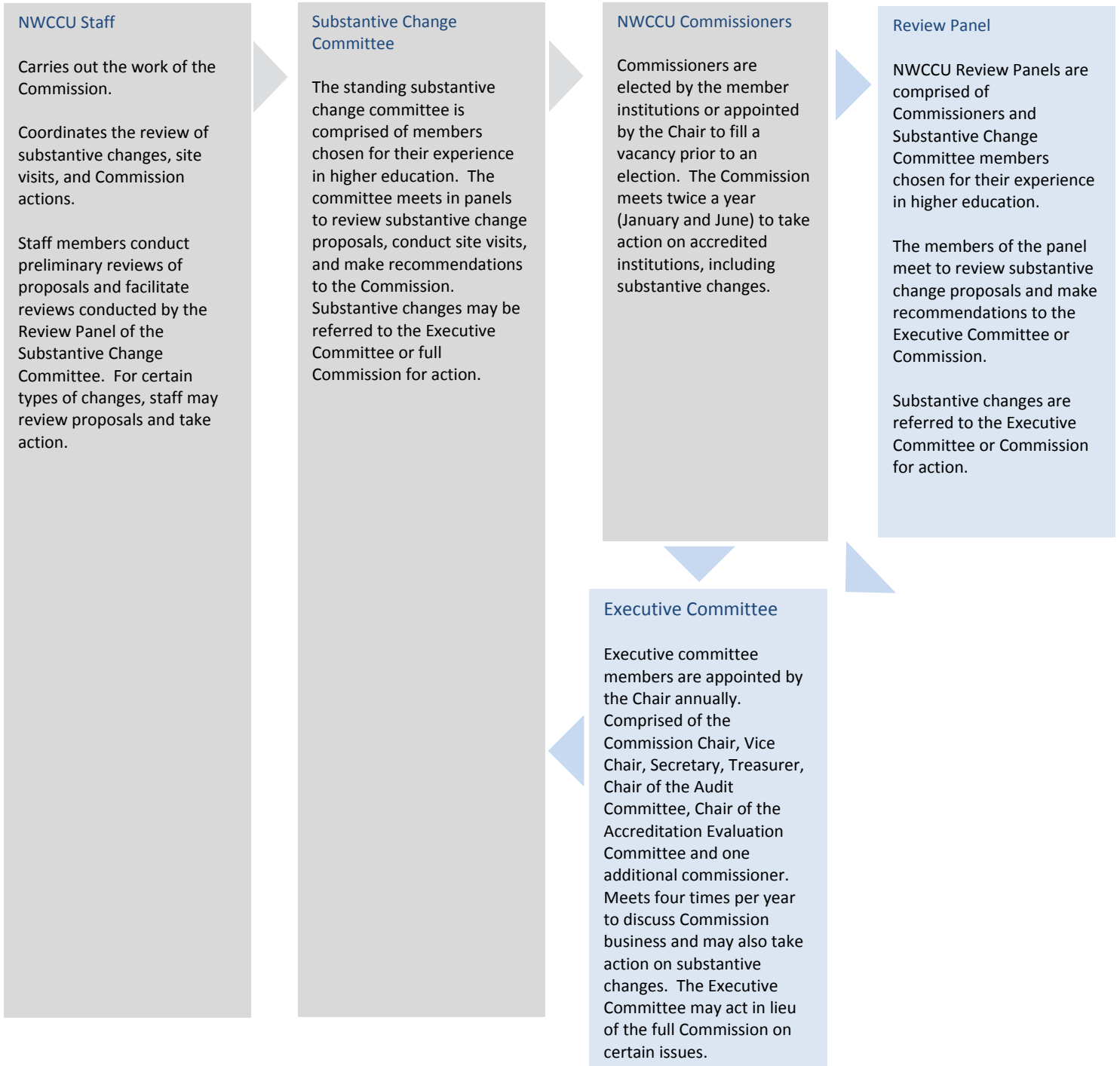
Change Category	Major or Minor	Level of Review	Site Visit Required?
Joint Degree Program <ul style="list-style-type: none"> <li>Entering into a contract under which an institution or organization not certified to participate in Title IV offers more than 25 percent of one or more of an accredited Title IV-eligible institution's educational programs.</li> </ul>	Major	Panel Review	No
Establishing an additional location at either an international location or location outside the institution's region where 50% or more of the program requirement can be earned via face-to-face instructional delivery. (First three locations only) <sup>5</sup>	Major	Panel Review	Post-implementation visit may be required
Establishing a new branch campus including one established or acquired in order to provide for teach-out from another institution	Major	Panel Review	Post-implementation visit may be required
Change from clock to credit hours (or vice versa)	Major	Staff Review	No
Adding the first academic program at a degree or credential level not previously included in the institution's accreditation by NWCCU. (2nd and 3rd programs at the new degree or credential level are reviewed by Staff) <sup>1</sup>	Major	Panel and Staff Review	Pre-implementation visit may be required Post-implementation may be required
Substantially changing of institutional mission or objectives	Major	Panel and Executive Committee or Commission Review	Pre-implementation visit may be required Post-implementation visit required within six months of implementation <sup>7</sup>
Change legal status, form of control, or ownership	Major	Panel and Executive Committee or Commission Review	Pre-implementation visit may be required Post-implementation visit required within six months of implementation <sup>7</sup>
Acquiring or merging with another institution or any program or location of another institution	Major	Panel and Executive Committee or Commission Review	Post-implementation visit required within six months of implementation <sup>7</sup>

1. The first three programs at each credential level will require a review by a Review Panel for the first program and staff review for the latter two programs. New programs that represent a significant departure from existing offerings since the last reaffirmation of accreditation will be reviewed. All programs will be reviewed for institutions with Candidacy status and newly NWCCU accredited Institutions through their first reaffirmation of accreditation.

2. If the program is also the first program at a new degree level, the proposal will be reviewed by the Panel and will require a site visit.
3. The first three distance education programs will require reviews.
4. The first three competency-based degree programs at an institution will be reviewed by the Review Panel for the first program and staff review for the latter two programs.
5. New programs that represent a significant departure from existing offerings since the last reaffirmation of accreditation will require a review.
6. See sections in this manual on Dual Degree Programs and Joint Degree Programs for more information on approval requirements.
7. Evaluator expenses and the applicable site visit fee will be charged to the institution. Please refer to the NWCCU website for the current Schedule of Dues and Fees.



# Overview of the NWCCU Commission and the Substantive Change Review Process



## Institutions on Sanction

If an institution has been issued a sanction by the Commission (Warning, Probation, or Show Cause), all new programs, locations, or organizational changes must be reviewed and approved by the Commission prior to implementation. In some cases, an institution may be prohibited from implementing new programs or locations until the sanction is removed.

## Candidate and Newly Accredited Institutions

Newly accredited institutions are required to have all new locations reviewed through their first reaffirmation. Institutions with Candidate status will be required to have all programs reviewed through regularly scheduled evaluations.

## Levels of Substantive Change Review

In some cases, a substantive change proposal may be reviewed by NWCCU staff. In other cases, the proposal is reviewed by a Review Panel of the Substantive Change Committee, the Executive Committee, and/or the Board of Commissioners.

**Staff Review.** NWCCU staff members may review the following:

- New non-degree program (a series of credit-bearing courses that result in a credential and represents a significant departure from the institution's current offerings or modality);
- New degree programs representing a significant departure from those that were offered since NWCCU last evaluated the institution;
- Initiating or expanding distance education delivery where 50% or more of the courses or credits in a program are using distance delivery (required only for the first three programs);
- New additional location at which 50 percent or more of an educational program is offered;
- Change in length of a program (typically an increase of 25 percent or more of total program credits); and
- The addition of a dual degree program where more than 50% of the program is offered under a consortium agreement between accredited institutions inside or outside the NWCCU region.

**Panel Review:** A Review Panel of the Substantive Change Committee reviews changes including:

- The first program offered at a new credential level (research doctorates and professional doctorates are considered as distinct credential levels and includes dual and joint degrees- for example Bachelor of Applied Science to Bachelor of Arts and Bachelor of Science);
- The first program offered using a new delivery modality—distance education or Competency-Based Education/and or Direct Assessment program;
- Branch campus location;
- The first three international locations offering 50% or more of total program credits;
- New joint program that will be delivered under a contract or agreement with an institution or organization not eligible to participate in Title IV, Higher Education Authorization (HEA) programs;
- Teach-out agreement with another institution if the agreement results in the identification or establishment of a new location;

- Change in mission\* (or objectives); and
- Change in legal status, ownership, form of control, and including mergers and acquisitions\*.

Institutions are reminded to consult with NWCCU staff regarding the change being proposed. The staff can confirm the appropriate category of the change and identify any restrictions on or additional requirements for substantive change that have been imposed on the institution by the Commission.

### **Expedited Changes Requiring Staff Review**

If the institution submits an expedited proposal for staff review, notification of the outcome of the review occurs within 14 business days after receipt of payment. No further Commission approval is required, and expedited reviews are at the discretion of NWCCU. See the Substantive Change Fee Chart for the cost of an expedited review.

---

\* These types of reviews must include a recommendation from the Review Panel considered at a meeting of the Commission because of the complexity of the change to affect the institution as a whole. The Commission meets in January and June.

# Categories of Changes

## Changing the Name of a Program

Changing the name of an approved program does not require approval unless other significant changes have been made to the curriculum or length of the program. Institutions should notify NWCCU when a name change has occurred. If additional changes have been made to the program and it is unclear whether the program may require substantive change review, please consult a NWCCU staff.

## Changing the Curriculum or Requirements of a Program

NWCCU may require substantive change approval when proposed alterations would result in a significantly different program, such as a 25% or more increase in the number of required credit hours.

## Not a Significant Departure

Adding a program that is not a significant departure from an institution's current approved curricular offerings or approved modality requires a notification to the Commission. As part of notifying NWCCU of implementation, the institution may be asked to identify the existing closely related program(s) that demonstrates the new program is not a significant departure. If the staff determines that the program is a significant departure, the institution will be notified and required to submit a proposal to be reviewed. If there is any doubt as to whether or not a new program is a significant departure from current offerings, please consult with the NWCCU staff.

# Minor Changes

## Significant Departure

A program that is a significant departure in either content or modality from the institution's current offerings will require a review by NWCCU. Generally, these changes are considered minor and will be reviewed by staff and will follow a timeline of approximately two months. NWCCU does reserve the right to refer the proposal to the Substantive Change Committee for review. Examples of significant departures include an offering in a curricular area in which the institution has no current approved programs (such as a new accounting certificate offered by an institution with no Business programs) or offering an online program at an institution with fewer than three approved online programs. If there is any doubt as to whether or not a new program is a significant departure from current offerings, please consult with the NWCCU staff.

## New Degree Programs at a New Degree or Credential Level

This category includes the first three programs at a degree level where those programs represent a significant departure from an institution's existing offerings. NWCCU utilizes the United States Department of Education's definition of a program as leading to "an academic or professional degree, certificate, or other recognized educational credential." The initiation of a few courses that equal less than 50 percent of a degree program does not require NWCCU approval.

If an institution has been approved by the Commission to offer programs at a degree level (associate, bachelor's, master's, research doctorate, or professional doctorate), it does not have blanket authority to initiate additional programs at that degree level without prior approval. In addition, institutions must notify NWCCU with a listing of closely related programs to determine if a new program represents a significant departure from its existing offerings.

## Non-Degree Program Review Requirements

Institutions are required to notify the Commission of new credit-bearing non-degree programs (including Title IV-eligible) which are not closely related to existing programs—a significant departure for the institution. For this purpose, a non-degree program is defined as a series of courses constituting a program of study that;

- results in a credential of some kind (certificate, diploma, credential, etc.); or
- results in a credential that is independent and not awarded as a result of completing an approved degree program.

### New Non-Degree Programs

A non-degree program is defined as a series of courses that carry academic credit and result in a credential other than a degree. A new program that is not a significant departure from an institution's current offerings or modality will not require a review. In this case, the institution must notify NWCCU of the program's implementation. If a new program does represent a significant departure from an institution's current offerings or modality, regardless of credit totals, it will require a staff review. Certificates or credentials that are awarded as a result of the completion of a degree program do not need to be separately reported nor reviewed (for example, a teaching credential earned upon completion of a degree program in Education).

Example of a new program that is a significant departure from current offerings: a certificate in accounting offered by an institution with no existing Business programs.

Example of a new program that is a significant departure from current modality: a new online certificate program offered by an institution with few or no existing online programs.

### Increase in Credits for Program Completion

If an institution plans to substantially increase the number of clock or credit hours awarded for successful completion of a program (more than 25% of total program credits or clock hours), a minor change proposal is required.

### Distance Education Program

An institution will undergo a staff review for the first three distance education programs, with an evaluation taking place at the time of the third review to determine the capacity to implement further distance education programs not representing a significant departure from existing offerings.

Distance Education delivers instruction to students who are separated from the instructor. It supports regular and substantive interaction between the students and the instructor, either synchronously or asynchronously, via electronic/online technologies. The U.S. Department of Education defines Distance Education as:

“Distance education means education that uses one or more of the technologies listed below 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;
2. One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
3. Audio conferencing; 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)”

In keeping with federal policy, NWCCU requires institutions that offer distance education to have processes in place through which the institution establishes that each registered student is the same student who participates in and completes the course or program and receives the academic credit. Therefore, the institution must employ methods such as:

- A secure log-in and pass code
- Proctored examinations
- Technologies or practices that are effective in verifying student identity

In so doing, the institution must make clear in writing at the time of enrollment or registration that it uses processes that protect student privacy and must notify students of any additional fees associated with the verification of student identity.

## **Off-Campus Sites – Additional Instructional Sites**

### **Additional Location**

A site where 50 percent or more of at least one program is offered. This applies to locations within the United States.

NWCCU requires prior approval for two types of off-campus sites: additional locations and branch campuses (branch campuses require a Panel Review). Proposals to establish a new location must include the following:

- The educational program(s) to be offered;
- The projected revenues and expenditures and cash flow; and
- Description of administrative operation and physical resources.

Telecast locations fall under the distance education category and are not considered new sites.

Note that the Department of Education requires that NWCCU maintain addresses of ALL locations geographically separate from the main campus at which 50% or more of at least one educational program (including credentials, certificates, and other non-degree programs carrying academic credit) is offered, regardless of their distance from the main campus. It is the responsibility of every accredited institution to report accurate and current addresses to NWCCU.

Institutions that seek approval for more than four off-campus locations in a year are subject to a staff review, which could trigger an Ad Hoc Visit to assess growth over the past three years or a comprehensive review to assess the institution’s ability to maintain high quality in light of its growth.

### **Consortium Partnerships with Other Institutions with a New Location:**

An institution planning to offer programs in a consortium agreement with another institution must submit a Memorandum of Understanding (MOU) or comparable document with its proposal that clearly articulates each institution’s responsibility for academic and support services.

### **Site Visit Requirement**

A site visit may be required within six months after the establishment of new off-campus locations that require substantive change approval. In addition, a sample of previously approved domestic locations will be visited during the institution’s Mission Fulfillment and Sustainability Evaluation.

### **Renaming a Location**

Changing the name of a site, including the main campus, does not require prior approval if the mission and objectives of the institution remain the same. The institution must notify NWCCU at the time of the change.

### **Closing a Location**

If an institution intends to cease operations entirely or close any location that offers 100 percent of at least one program, the institution must notify NWCCU and include a teach-out plan. A Committee review may be required, at the staff's discretion.

### **Teach-Out Agreement with Another Institution**

If an institution determines that one or more programs will be taught out and enters into an agreement with another institution to teach-out its programs, and the partner institution plans to establish a new off-campus location that will operate beyond the terms of the teach-out, the location is subject to substantive change review.

## **Major Changes**

Substantive change panel reviews are required for the following kinds of changes:

### **First Competency-Based Education or Direct Assessment Degree Program**

The first competency-based or direct assessment degree program at an institution must be considered by the Review Panel and may be subject to a follow-up site visit one year after the program launches.

### **Competency-Based Education**

Competency-based education has two principal approaches:

1. A course/credit-based approach, and
2. A direct assessment approach.

In a course/credit-based approach, the demonstration of competencies is embedded into a conventional curriculum comprised of courses to be completed to earn credits toward a degree or credential. Course/credit-based programs generally enroll students in traditional academic terms and award credits for courses successfully completed. Students may accelerate their learning and they receive credit for the course when they have demonstrated mastery of the competencies by passing a summative assessment. Institutions may elect to create two academic transcripts, one that displays the credits earned (and grade point average or GPA) and one that specifies the competencies attained.

An institution is expected to seek prior NWCCU approval when 50 percent or more of the degree program is awarded on the basis of the assessment of student competencies. The first direct assessment competency/credit hour hybrid program at an institution will be reviewed via Panel Review.

### **Direct Assessment Programs**

Direct assessment programs: Because a degree/credential is awarded only on the basis of the attainment of competencies and not on the award of credit, per federal regulations, direct assessment programs must be approved by the accreditor. Therefore, institutions proposing to offer direct assessment programs must submit their plans to their accrediting agency for approval prior to implementation. Federal regulations require accreditors to incorporate into their substantive change review an assessment of the sufficiency of faculty resources to support the program, including the qualifications of instructional staff. In addition,



the federal regulations require accreditors to evaluate and approve the institution's methodology for determining the credit hour equivalence of the direct assessment measures.

As applied to the NWCCU Policy, Substantive Change, a direct assessment program has five main elements:

1. The program is designed and delivered within the framework of the program's defined knowledge, skills, and competencies as demonstrated by students, rather than in terms of prescribed courses.
2. A student may acquire the requisite competencies from multiple sources and at various times other than, or in addition to, the learning experiences provided by the institution. As such, the length of time it takes to demonstrate learning may be different for each student. Time is the variable; learning is the constant.
3. The institution employs assessment strategies that are capable of establishing each student's achievement of each competency at the level of rigor appropriate to the degree being offered. These strategies will be responsive to the complexity of learning and the accumulation and integration of knowledge expected for the degree, such as through capstone projects or portfolios.
4. The institution establishes that the outcomes for the degree are equivalent in scope and rigor to those of recognized degree programs offered in traditional formats at other institutions or in its own course catalog.
5. The institution has well-developed policies that address related NWCCU and/or federal requirements, including: credit hour definitions; transcript recording and reporting; the assessment and award of credit for prior learning; the roles of faculty members and other educational professionals; disbursement of financial aid; and tuition charges and refunds.

An institution is expected to seek prior NWCCU approval when 50 percent or more of the degree program is awarded on the basis of the assessment of student competencies. The first direct assessment competency/credit hour hybrid program at an institution will be reviewed via Panel Review.

### **First Degree at a New Degree Level**

The first degree program offered at a level at which the institution does not already offer degrees (associate, bachelor's, master's, doctorate,) must be considered by a Review Panel. Professional doctorates and research doctorates are considered distinct credential levels, and the first credential at each degree level requires a Panel Review. Upon approval of a new degree level of accreditation, the institution will host a follow-up evaluation required by an onsite evaluator to evaluate the implementation of the degree level or credential according to institutional plans.

### **Special Requirements for Doctoral Degrees: Research and Professional Doctorate Degrees**

According to the U.S. Department of Education, the research doctorate, or the Doctor of Philosophy (Ph.D.) and its equivalent titles, represents the highest academic qualification in the U.S. education system. While the structure of U.S. doctoral programs is more formal and complex than in some other systems, it is important to note that the research doctorate is not awarded for the preliminary advanced study that leads to doctoral candidacy, but rather for successfully completing and defending the independent research presented in the form of the doctoral dissertation.

Professional doctorate degrees, also known as first-professional degrees, represent a category of qualifications in professional subject areas that require students to have previously completed specified undergraduate coursework and/or degrees before enrolling. They are considered graduate-level programs



in the U.S. system because they follow prior undergraduate studies, but they are in fact first degrees in these professional subjects. Several of these degrees use the term “doctor” in the title, but these degrees do not contain an independent research component or require a dissertation and should not be confused with PhD degrees or other research doctorates.

The institution must demonstrate an understanding of the distinctive character of doctoral education, support a doctoral culture while maintaining institutional capacity, and sustain appropriate systems of educational effectiveness at the highest level of graduate education.

Proposals must define the nature and significance of the doctoral degree for the institution and provide a comprehensive analysis of institutional capacity to support student learning at this advanced level. The analysis must be presented in the context of institutional capacity and the educational effectiveness of existing degree levels.

Proposals are expected to use the Standards of Accreditation and Eligibility Requirements, as listed in the [Accreditation Handbook](#), as a framework for analysis. In light of the five Standards, the Commission expects that institutions will consider the following issues in proposals seeking prior approval of the doctorate:

**1. Doctoral education must be aligned with institutional purposes and educational objectives. (Standard 1)**

An institution engaged at this level is making a conscious commitment to create an institutional culture that is supportive of research and professional practice. It is appropriate for an institution to ask itself how this culture fits within the existing institutional mission.

**2. The objectives of doctoral education have particular implications for core institutional functions. (Standard 2)**

Doctoral programs differ substantially from other degree levels in the depth and breadth of required study, in the increased demands on student intellectual and creative capacity, and in the commitment to developing scholars and practitioners at the highest level. Institutions need to consider whether the program is structured to meet these higher expectations for the degree level by demonstrating how student learning outcomes will be achieved and how support for scholarship and creative activity will be provided for professional development of faculty members and students.

**3. Doctoral education requires specialized resources. (Standard 2)**

The intellectual interaction between doctoral students and faculty is distinctive and central in doctoral education. Institutions need to consider whether the program has the faculty, information resources, and organizational support services to meet the requirements of the advanced degree.

**4. Doctoral education requires special processes for evaluating educational effectiveness. (Standard 3 and 4)**

Institutions need to demonstrate that quality assurance systems are aligned with the expectations of a doctoral-level education, and are fully integrated with the existing academic culture.

## **Off-Campus Sites – Branch Campus, Teach-outs, and International Sites**

### **Branch Campus**

Branch Campus is an expanded off-campus location that may serve as an administrative and support center

for additional locations and as a facility for offering off-campus programs. A panel review for approval of a branch campus is required. To be designated as a branch campus, the location must meet all of the following requirements:

- 50 percent or more of at least one total program's requirements will be offered at the location;
- The location is permanent in nature;
- The location has its own faculty and administrative or supervisory organization; and
- The location has its own budgetary and hiring authority.

Proposals to establish a new branch location must include the following:

- The educational program(s) to be offered;
- The projected revenues and expenditures and cash flow; and
- Description of administrative operation and physical resources.

#### 1. Domestic Locations

A domestic branch campus proposed by an institution is subject to a Panel Review of the Substantive Change Committee. If, during the review, the Panel determines that the proposed location requires additional review, or if an institution's accreditation status has changed (i.e., placed on sanction), a review by the Executive Committee may be required.

Once a branch campus is approved with at least one program, an institution may offer any other approved on-site programs at that location without seeking substantive change approval. Institutions may call their off-campus sites branch campuses, satellite centers, extension programs, or whatever else they choose.

#### 2. International Locations

Branch campus locations to be operated outside of the United States require review by a Panel of the Substantive Change Committee.

Institutions that seek approval of more than four off-campus locations in a year are subject to a staff review for rapid growth. This review could trigger a) a special visit to assess growth over the past three years or b) a comprehensive review to assess the institution's ability to maintain high quality in light of its rapid growth.

#### **Moving a Main or Branch Campus**

An institution is required to seek NWCCU approval to move either its main campus or a branch campus more than 20 miles prior to the change of location. Moves of over 20 miles will be considered to be the closing of one branch and opening of a new one. Questions addressing teach-out plans and facilities will need to be addressed. The change of location of the main campus must be reported to NWCCU sufficiently in advance for NWCCU staff to review the plans for the move.

#### **Contractual Partnerships with Other Institutions with a New Location:**

An institution planning to offer programs with another institution not regionally accredited, must submit a Contractual Agreement or comparable document with its proposal that clearly articulates each institution's responsibility for academic and support services. The arrangements must adhere to NWCCU's Policy [Contractual Relationships with Organizations Not Regionally Accredited.](#)

## Teach Out

### Closing a Program

NWCCU reviews teach-out plans for the discontinuation of programs when the plan includes the closure of a location. Institutions should consult, and are expected to comply with, the Policy [Teach-Out Plans and Teach-Out Agreements](#). Program closures require institutional notification to NWCCU and generally not a substantive change proposal.

### Closing a Location

If an institution intends to suspend or cease operations entirely or close any location that offers 50 percent of at least one program, the institution must notify NWCCU and include a teach-out plan for staff to review. A Substantive Change Committee review may be required, at the staff's discretion.

### Teach-Out Agreement with Another Institution

If an institution determines that one or more programs will be taught out and enters into an agreement with another institution to teach-out its programs, and the partner institution plans to establish a new off-campus location that will operate beyond the terms of the teach-out, the location is subject to substantive change review.

### Agreements with Unaccredited Entities

Federal regulations require that new programs with more than 25 percent of coursework delivered (in any modality) under contract with an institution or organization not certified to participate in Title IV HEA programs receive substantive change approval prior to implementation. Institutions considering this kind of arrangement should review NWCCU's Policy [Contractual Relationships with Organizations Not Regionally Accredited](#).

## International Sites

If an institution establishing a location at either an international location or location outside the institution's region where 50% or more of the program requirement can be earned via face-to-face instructional delivery. (First three locations only)

### Change from Clock Hours to Credit Hours

If an institution changes a program from clock hours to credit hours, a major change proposal is required and is evaluated by a Review Panel.

### Dual Degree Program

A dual degree program is offered through a consortium agreement collaboratively by two or more institutions, whether inside or outside the Northwest Region, and leads to the award of a separate degree from each of the participating institutions.

Dual degree programs require prior approval if:

- Either institution is not authorized to offer programs at the requisite degree level without seeking prior substantive change approval or offers more than 50% of the program for the other consortium partner; or
- Either institution's degree is a significant departure from programs previously evaluated by the NWCCU.

If the program represents a new degree level or credential for either institution, the change is considered by

the Review Panel.

If one of the partnering institutions is on sanction, any new program, including a dual degree program, must be approved through the substantive change process. The Committee will decide whether a site visit is necessary during the review of the substantive change proposal in this case.

### **Joint Degree Program**

A joint degree program is one that is offered through a contractual agreement between two or more institutions and leads to the award of one degree with both institutions' names on the diploma.

If the joint degree program is also the first degree program at a specific degree level or credential for one or more of the institutions, the change is considered organizational in nature and will require Panel Review by the Substantive Change Committee.

If one of the partnering institutions is on sanction with NWCCU, any new program, including a joint degree program must be approved through the substantive change process. The Review Panel will decide whether a site visit is necessary during the review of the substantive change proposal.

The proposal for a joint degree program must be jointly developed by the partnering institutions and the institutions must provide information concerning the support to be provided and an assessment of the impact the program will have on each institution.

### **Change in Mission or Core Themes and Objectives**

A change in mission is defined as a significant change to the objectives of the institution and requires a major change proposal. Similarly, a change to core themes and objectives that significantly changes the assessment of mission fulfillment through data collection and analysis is considered a major change. Institutions are strongly encouraged to communicate with a staff liaison to determine if changes be considered are appropriate to this category of change.

### **Acquisitions or Merging with Another Institution**

A major change proposal is required if an institution is acquiring another institution or merging with another institution or any program or location of another institution.

### **Institutional Organization Change: Legal Status, Ownership, or Form of Control**

Organizational changes involve alteration in legal status, ownership, or form of control, and such changes affect the institution in its entirety. These changes include the following:

1. A change in legal status of the institution is defined as a change in ownership, e.g., a merger with another institution or organization. A change in ownership or form of control of a parent entity that owns a NWCCU-accredited institution also constitutes an institutional organization change.
2. A change in form of control shall be understood to mean the possession, direct or indirect, of the power to direct or cause the direction of, the management and policies of an institution, corporation, partnership or other entity, whether through the ownership of voting securities, by contract, change of the majority of the board membership, or otherwise.

When an unaccredited institution merges with a NWCCU-accredited institution, accreditation is not automatic. Institutions are strongly encouraged to consult with NWCCU staff to discuss the process and timeline for a change of this nature.

Changes such as legal status, ownership, form of control, and mergers, may be so extensive that they

warrant a fuller review because they could result in an entirely new institution. In such cases, NWCCU staff or the Substantive Change Committee could require the institution to undergo a comprehensive review or be reviewed through the Eligibility Requirements of the application for accreditation process.

Institutions planning a change in ownership or form of control must provide:

1. An Acquisition Plan that shows how the institution, under the new owner, will continue to meet all eligibility requirements and accreditation standards. Also required: relevant filings with the U.S. Securities and Exchange Commission (if applicable). The principals of the acquiring entity must demonstrate the experience and expertise necessary to operate the institution and, if they operate other institutions, full compliance with applicable laws, rules, and regulations.
2. A Description of New Initiatives that are planned or anticipated for the first year of the new ownership or change of form of control if they could materially affect the mission, plans, and/or operations of the institution (such as restructuring management, increasing enrollment, or adding several new programs or locations). If such changes could be considered substantive (involving change of mission, for example), the change of ownership or form of control application must address them.
3. A Description of Finances showing how the viability of the related entity and the institution could be affected by the change of ownership or form of control and how both partners plan to meet upcoming financial needs.

The Commission will protect the confidential nature of all information submitted by institutions or by related entities, except as otherwise required by law.

#### **Required Documents**

In order to conduct a thorough review, the Commission requires full access to drafts of governing board-approved documents, as appropriate to each change category, such as:

- Documents that establish the legal definition and status of both the current and the proposed ownership and governance entities.
- Documents that describe the relationship between the institution's ownership entity and a) the board/s membership and b) any other legally related entities, in order to ensure compliance with NWCCU's expectation for an independent and qualified governing board. These would include the bylaws or the equivalent organizing document and a list of the proposed board members with their affiliations and qualifications.
- If the institution or a related entity of the institution is for-profit, a description of how the proposed ownership will be held (as stock, shares of ownership, or other equity types) and of the relationship between ownership interest and voting authority on the institution's governing body.
- A description of how a proposed transfer of ownership or form of control will impact the exercise of institutional control, authority, and governance.
- Other documents specified in the current substantive change template for a change of mission/legal status/ownership/form of control.
- Documents that describe the rationale for a change of mission and that provide an analysis of the impact of that change on academic structures, faculty and staff members, student body

composition, enrollment, outcomes, allocation of resources, and related dimensions of the organization.

## Changes Requiring Commission Review

Some changes reach beyond a particular program or location and affect the institution as a whole. These institutional changes require the following steps:

1. Review and interim acceptance by the Review Panel of the Substantive Change Committee and/or Executive Committee of the Commission;
2. Approval by the Commission; and
3. Follow-up site visit six months to one year after implementation (as applicable).

Note that institutional organization change reviews generally take at least two to four months longer to complete than reviews conducted only by the NWCCU staff or Review Panels. Institutions should submit the Substantive Change proposal and fee six months to nine months before planning to implement the change.

Note that institutional organization changes for a change of ownership or form of control will only be considered by the full Commission at one of the two in-person Commission meetings each year (January and June), unless under exceptional circumstances. It is important to keep this timing in mind when scheduling the review.

## Noncompliance with Substantive Change Policies

Candidate and accredited institutions are responsible for developing internal procedures to ensure compliance with the Commission's substantive change policies and procedures, and to guarantee that new sites or programs or other changes are not initiated without obtaining the necessary approval. Such off-campus and/or distance education programs or sites are eligible for federal financial aid only if they are recognized and approved through the Commission's process.

If the Commission determines that a site or program has been implemented without obtaining the necessary approval, the institution will be required to cease enrollments at that site or for that program until the substantive change approval(s) has been obtained.

When noncompliance occurs, the president of the institution will be notified and the institution will be required to submit a response with the following information, in addition to the relevant substantive change proposal(s), at the time of its substantive change review:

1. Clarification of the circumstances in which the change was implemented prior to receiving the requisite substantive change approval(s).
2. Audit of the institution's off-campus and distance education programs. Additional programs/locations that are found to be in noncompliance must be reported and scheduled for review.
3. Identification of the processes in place or to be put in place to ensure that all future programs/locations receive necessary approvals prior to implementation.

After the Substantive Change Committee reviews this information, the matter will be forwarded to the Commission to determine if a sanction may be imposed for violation of the institution's responsibilities under Eligibility Requirement 20, Disclosure (ER 20).

# Section Two: Substantive Change Review Procedures

---

This section provides detailed information on the substantive change proposal development and review process.

## Step 1: Determine Whether a Change Requires Notification or a Formal Proposal

The Substantive Change Policy and its procedures describe in detail the categories and definitions of substantive changes requiring approval before implementation. Determining the type of change is very important, as it is the basis for how the institution navigates the substantive change process. Please see the detailed table in this Manual for further instructions on determining the category of review for each proposal. Institutions are encouraged to contact the NWCCU staff for any additional guidance.

If the change requires notification, please follow the instructions for the submission of notification on the NWCCU website. In the case of notification, the institution will receive an acknowledgement of the proposed change and may proceed with the change as of the date of the acknowledgement letter.

## Step 2: Develop the Proposal

If the substantive change requires a proposal, the ALO should review the instructions on completing and submitting the proposal. The ALO is responsible for drafting the proposal and for reviewing the proposal for completeness and accuracy prior to submission to NWCCU.

Templates have been developed to correspond specifically to each type of substantive change. Please follow the instructions included in the template and respond to each question in the template.

All documents must be uploaded through the online proposal template (located on the NWCCU website). Contact the NWCCU staff for more information.

The online proposal templates will require institutional responses to:

- 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 review 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.
- j. 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.

Proposals found to be of high quality are:

- Clearly written and responsive to each question;
- Linked to institutional mission and objectives;
- Supported by data and evidence, e.g., market analysis;
- Show alignment between program and course learning outcomes;
- Based on planning processes that include key academic faculty members, staff members, and administrators; and
- Illustrative of the financial capacity of the institution to sustain the program or location, i.e., have complete and detailed budgets.

#### *Institution Internal Review*

Before submitting the proposal to NWCCU, the ALO is expected to conduct a thorough review of the entire proposal to ensure that all required elements of the assigned template have been completed, to check for spelling and grammatical errors, and to ensure consistency in formatting.

All proposals must also go through an institution's appropriate internal institutional approval process. Prior to submission, proposals must have obtained all relevant internal and external approvals – for example, from the president or chancellor, the chief academic officer, the curriculum committee, the faculty senate, the governing board, and/or the system office — in keeping with the institution's quality assurance processes. The institution must also demonstrate that faculty members have been appropriately involved in developing and approving the program, especially those who will be responsible for its delivery.

### **Step 3: Submit Proposal and Fee**

The Accreditation Liaison Officer (ALO) submits the Substantive Change proposal and pays the appropriate fee (found on the NWCCU website). The proposal, signed by the institution's ALO to ensure that the proposed change is supported by the institution, should be submitted to NWCCU at least two months prior to the anticipated implementation date to ensure adequate time to complete the review and approval process.

Reviews are scheduled on a first-come, first-served basis. Receipt of the proposal and fee will reserve a place on the review calendar. Proposals will not be processed until payment is received.

#### **Review Time Frame**

It is important to consider the full time frame for the review process. Note that the Commission requires the institution to obtain prior approval of the substantive change before the Commission includes the change in the scope of the accreditation or preaccreditation granted to the institution. The time frame for approval may vary based on the complexity of the proposed change. Changes requiring Panel Review such as the first Competency-Based Education Direct Assessment program, and those requiring site visits, take longer to complete. Changes for a change of ownership or form of control will be considered by the Change Committee and the full Commission at one of the two in-person Commission meetings each year (January and June), unless under exceptional circumstances.

#### **Preliminary Review by NWCCU Staff**

Once the proposal is submitted, NWCCU staff members will review the proposal and give the institution the opportunity to provide any missing information and to clarify any aspects of the proposal that are not clear. NWCCU staff will send the ALO an email with instructions for submitting any additional information. Upon receipt of the revisions, the proposal will be forwarded to the appropriate individual or Panel for review.

### **Step 4: The Review**

All substantive change proposals are reviewed by a member of the NWCCU staff, or by a two- or three-person Review Panel selected from the Substantive Change Committee.

Where a Review Panel is required, the Panel is comprised of Commissioners and/or peers from within the NWCCU region who are chosen based on their experience in higher education and in substantive change matters. The Panel reviews and assesses each proposal and uses these preliminary evaluations to guide the discussion and decision. In some cases, a Review Panel may require additional materials from the institution.

### **Step 5: Receive Notification from NWCCU**

Typically, NWCCU staff will inform the ALO by electronic correspondence of the Staff's or Review Panel's action. The institution will be notified by email when Final Approval has been granted or denied. Commission Staff may accept the proposal with or without conditions, defer the acceptance of a proposal

prior to receiving additional information, or refer the proposal to a Review Panel.

Where an institution's proposal has been reviewed by a Review Panel, the Panel will take one of the following actions:

- Accept the proposal with no conditions;
- Accept the proposal with conditions;
- Defer action pending receipt of additional information;
- Proceed to Site Visit (if applicable); or
- Defer action and refer the proposal to the Executive Committee of the Commission with a recommendation for action at its next regularly scheduled meeting.

#### *Revising a Proposal or Providing Additional Information*

The Review Panel may determine that a proposed change is not sufficiently well developed or lacks adequate detail to be forwarded to the Commission for approval, in which case the Committee will be returned to the institution for further development. The institution will receive from NWCCU, on behalf of the Review Panel, an action letter that specifies the reasons acceptance was withheld, citing the relevant criteria relating to the Eligibility Requirements or Standards of Accreditation, the specific issues that need to be addressed in a resubmission, and information on the steps to resubmit the proposal if the institution chooses to do so.

The revised proposal needs only address the specific issues cited by the Review Panel. The institution has three months to resubmit; after that period, a new proposal must be submitted for consideration.

A resubmission fee is due prior to consideration of the resubmitted proposal. Please consult the current Schedule of Dues and Fees.

Typically, a revised proposal is reviewed by the same Review Panel as originally assigned from the Substantive Change Committee. However, for a resubmission, the Substantive Change Committee may request another review by a different Review Panel or the Executive Committee if it deems these steps to be necessary. The institution is responsible for addressing any requests for additional information or conducting any other follow-up requested.

If a resubmitted proposal meets the expectations of the Review Panel, it will be forwarded to the Commission for consideration (or a site visit will be scheduled, if warranted).

#### *Executive Committee Decision*

When a proposal has been sent to the Executive Committee, the Executive Committee will consider the proposal and will communicate its decision promptly. The Executive Committee's may take the following actions:

- 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 Review Panel consider the proposal.

#### *Request for Reconsideration of Executive Committee Action*

If the proposal 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 the notification of the

Executive Committee's denial of the change.

## **Step 6: When Required, Host a Site Visit**

If the Review Panel recommends proceeding to a required site visit, NWCCU staff will work with the ALO to determine a date for the visit, which typically lasts one day. The visit will be conducted by a Site Visit Team of one or two members of the Review Panel and is designed to gain more detailed information about the proposed change and its impact on the institution. The agenda for the visit by this Site Visit Team may include meetings with faculty members, administrators, students, and others on campus. The ALO will work with the Site Visit Team to finalize the agenda and arrange for the Site Visit Team's accommodations.

The Site Visit Team will submit a visit report to NWCCU, which will be forwarded to the institution for correction of errors of fact. The institution will have one week to respond. The Site Visit Team will then review the changes and revise the report as appropriate. At this time, the institution may submit a written response to the visit report which will become part of the review materials for the proposal. The original proposal, the visit report, and the institutional response (if applicable) will be forwarded to the Executive Committee for its consideration.

### ***Expenses***

Site Visit Team expenses and the applicable site visit fee will be charged to the institution. Please refer to the NWCCU website for the current Schedule of Dues and Fees.

## **Step 7: Receive Final Approval**

NWCCU must approve all substantive changes. In all cases where a proposal is required, final approval must be granted by the NWCCU before any proposed change may be implemented.

### ***Substantive Changes***

Once a proposal receives Acceptance from the Substantive Change Committee Review Panel, the institution will be notified by email when final approval has been granted.

### ***Organizational Changes at the Institutional Level***

An organizational change proposal, along with the site visit report, the institution's response (if applicable) and the Substantive Change Committee Review Panel's recommendation, will be reviewed by the Executive Committee of the Commission.

The proposal, if approved by the Executive Committee, will be forwarded to the Commission for consideration of Final Approval (typically at one of the two in-person meetings each year, January or June). If the institution chooses to provide a written response to the visit report, the response will be considered by the Executive Committee.

If the proposal is Not Accepted by the Executive Committee, the institution will receive an action letter specifying the reasons for the decision, citing the relevant Eligibility Requirements or Standards of Accreditation, and, if appropriate, explaining how to resubmit the proposal if the institution chooses to do so.

### ***Review of a Proposal by the Commission (if applicable)***

The Commission meets twice per year. If a proposal is put on the agenda of the next regularly scheduled meeting and is considered by the full 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; or
- Request that a new Review Panel consider the proposal.

**If the proposal is denied approval by the Commission, the Commission’s decision is final and cannot be appealed.**

**Resubmission of a Significantly Revised Proposal Previously Denied**

Institutions may resubmit a significantly revised proposal that was denied for a new review at least three months beyond the notification date of denial.

# Section Three: Substantive Change Site Visits

---

Site visits are required for certain types of substantive changes, based on U.S. Department of Education and NWCCU policy. This section outlines the two types: pre-implementation and post-implementation.

## Site Visits

Site visits are required for most significant organizational changes, including:

- First degree at a new degree level or credential;
- First competency-based or direct assessment degree program;
- Change in mission, legal status, ownership, or form of control.

### Purpose and Scope

The primary purpose of a site visit is to assess how a proposed organizational change will be implemented, to answer questions identified by the Review Panel, and to determine the overall impact of the change on the institution.

One or two members of the Review Panel will conduct the visit over one or two days.

Substantive change site visits are typically narrow in scope and cover issues determined in advance. During a visit, Evaluation Review Panel members may:

- Meet with institutional representatives, faculty members, students, and third-party providers;
- Observe teaching and learning spaces;
- Learn more about the curriculum and assessment plans;
- Evaluate the financial and administrative capacity to offer the program, and/or;
- Seek additional information or perspectives.

The visit typically occurs when students are present and within 30 to 60 days following the Substantive Change Committee Panel review. In some cases, the visit may include branch campuses that provide administrative support or oversight to a site.

Following the visit, the site visit team will write a brief report, which will be forwarded to the institution for correction of errors of fact. The institution will have one week to respond and may provide a written response to the report that will become part of the review materials. The report will include a recommendation to either a) forward the proposal and all related materials to the Executive Committee for review or b) accept the proposal.

Site visits may be waived at the discretion of NWCCU staff or the Substantive Change Committee Review Panel.

### *Expenses*

Evaluator expenses and a site visit fee will be charged to the institution. Please refer to the NWCCU website for the current Schedule of Dues and Fees.

## Pre-Implementation Site Visits

In some situations, a site visit may be required prior to implementation of a substantive change. These situations include, but are not limited to:

- Substantial changes in mission, legal status, ownership, or form of control.
- Extenuating circumstances identified by the Substantive Change Committee or Commission staff.

One of the primary purposes of a pre-implementation visit is to ascertain that the new site has the personnel, facilities, and resources described in the substantive change proposal and that they are adequate to support the program(s) being offered. The institution must inform NWCCU that a substantive change in mission, legal status, ownership, or form of control is anticipated. NWCCU staff will then contact the institution to plan and schedule the required visit.

Following the visit, the site team will write a brief report that will be reviewed by the NWCCU staff and forwarded to the institution for correction of errors of fact. If the visit raises questions about compliance with NWCCU Standards or policies, it may be forwarded to the Executive Committee for further action.

### *Expenses*

Evaluator expenses and a site visit fee will be charged to the institution. Please refer to the NWCCU website for the current Schedule of Dues and Fees.

## Post-implementation Site Visits

Some substantive changes may require post-implementation site visits including:

- Off-campus sites (within six months of establishment) if the institution:
  - Has three or fewer additional locations;
  - Has not demonstrated a proven record of effective educational oversight of additional locations; or
  - Has been placed on sanction.
- International programs (six months to one year after implementation). Visits must be conducted within:
  - Six months, if students enrolled in the program are eligible for, and will seek, U.S. federally funded financial aid.
  - One year, if a) the site is an institution's first location in a country (visits may sometimes be waived at the discretion of the Substantive Change Committee) and b) students are not eligible for, or will not seek, U.S. federally funded financial aid.
- Changes in mission, legal status, ownership, or form of control (within six months of implementation).
- Visit requested by the Substantive Change Committee or Commission staff for extenuating circumstances.

### **Purpose and Scope**

One of the primary purposes of a post-implementation visit is to verify that the new site has the personnel, facilities, and resources described in the substantive change proposal and that they are adequate to support the program(s) being offered. The Review Panel action letter or report approving the proposal will note that a site visit is required within a specified time period after the implementation of the change and will outline the issues to be evaluated. The institution will inform NWCCU that a change of ownership has been completed or that a program at an approved site or off-campus location has been started. NWCCU staff will then contact the ALO to plan and schedule the visit.

Following the visit, the site team will write a brief report that will be reviewed by the NWCCU staff and forwarded to the institution for correction of errors of fact. If the visit raises questions about compliance with NWCCU Standards or policies, it may be forwarded to the Executive Committee for further action.

***Expenses***

Evaluator expenses and a site visit fee will be charged to the institution. Please refer to the NWCCU website for the current Schedule of Dues and Fees.



# Section Four: Appendices

## Appendix 1: Federal Regulations Concerning Substantive Change

Department of Education regulations require that accrediting agencies maintain adequate policies to ensure that any substantive change to the educational mission or program(s) of an institution does not adversely affect the capacity of the institution to continue to meet the accreditation standards of its region. Importantly, federal law mandates that accrediting agencies require institutions to obtain approval of the substantive change before it is included in the scope of the accreditation or pre-accreditation previously granted to the institution.

NWCCU's definition of substantive change is required to include at least the following types of changes, as defined by federal regulations:

- Any change in the established mission or objectives of the institution.
- Any change in the legal status, form of control, or ownership of the institution.
- The addition of courses or programs that represent a significant departure from the existing offerings of educational programs, or method of delivery, from those that were offered when the agency last evaluated the institution.
- The addition of programs of study at a degree or credential level different from that which is included in the institution's current accreditation or pre-accreditation.
- A change from clock hours to credit hours.
- A substantial increase in the number of clock or credit hours awarded for successful completion of a program.
- The entering into a contract under which an institution or organization not certified to participate in Title IV offers more than 25 percent of one or more of an accredited Title IV-eligible institution's educational programs.
- 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.
- The acquisition of any other institution or any program or location of another institution.
- The addition of 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.

Additionally, federal regulations require regional accreditation substantive change policies to address: 1) distance education, 2) branch campuses, and 3) site visits related to substantive changes. Moreover, substantive changes submitted by an institution that has been placed on Warning, Probation, or Show Cause may require additional reviews or site visits due to extenuating circumstances.

NWCCU's procedures must also include effective mechanisms for conducting:

- Visits at reasonable intervals to institutions that operate more than three additional locations, usually conducted during Mission Fulfillment and Sustainability Evaluations.
- Visits (at the NWCCU's discretion) for ensuring that institutions which experience rapid growth in the number of additional locations maintain educational quality.

## Appendix 2: NWCCU Resources Related to Substantive Change<sup>†</sup>

### Policies

- Accreditation of Non-U.S. Institutional Policy
- Considerations When Closing an Accredited and Candidate Institution Policy
- Contractual Relationships with Organizations Not Regionally Accredited Policy
- Credit Hour Policy
- Distance Education Policy
- Responsibilities for Title IV Oversight Policy
- Significant Growth Policy
- Student Verification Policy
- Substantive Change Policy
- Teach-out Plans and Teach-out Agreements Policy
- Transfer and Award of Academic Credit Policy

### Other Resources

- Dues and Fees Schedule
- Handbook of Accreditation
- C-RAC Common Framework for Competency-Based Education (CBE)
- CBE Review and Approval Requirements

---

<sup>†</sup> The policies and other documents referenced above, as well as other Commission documents, can be found on the NWCCU website

## Appendix 3: Common Issues in Substantive Change Proposals

This list identifies the most commonly cited areas of revision in substantive change proposals. Relevant Standards for Accreditation for commonly identified issues have also been included.

### Common Issues

#### *Institutional Accrediting History (Standard 2)*

- Is sufficient information provided about relevant issues raised in past substantive change reviews at the institution, even if the reviews were for programs at a different degree level and/or in different departments or colleges?
- Does the proposal provide responses to relevant issues raised in past Commission or Committee action letters? (For instance, were concerns raised about assessment or educational effectiveness?)

#### *Program Need (Standard 2.F.2 and 5.B.3)*

- Is the need for the program clearly documented beyond the institution's desire to offer the program?
- Does the evidence of need for the program include specific data about the institution and the region, in addition to national trends and employment outlook statistics?
- What activities has the institution undertaken to help assess need, e.g. student or graduate surveys, documenting the number of inquiries, business or professional indications of interest, etc.?
- Are the enrollment projections for the first three years provided?

#### *Marketing (Standard 2.D and 2.F)*

- Is the geographic scope of the program clearly identified?
- Does the marketing plan contain adequate outreach to the target population?
- Are the marketing costs included in the budget?

#### *Planning and Approval Process (Standard 2.A.1-3, 2.A.6)*

- Is proof of program approval included (minutes or letter of approval from President and/or system-wide office) along with the description of the institution's process?
- If a campus, is the Chancellor's office letter of approval attached to the proposal?

#### *External Partners (Standard 2.A.26)*

- Are signed MOUs attached for any arrangements with an external partner participating in the program (subcontractors, internship placement sites, off-campus facilities, etc.)?
- If the program has yet to develop arrangements with external partners, is there a sample signed MOU or a MOU template?

#### *Curriculum (Standard 2.C.1 and 2.C.4)*

- Does the list of courses for the major indicate which courses are required?
- Is a sample schedule provided that shows how a student might progress through the program from semester to semester?

#### *Syllabi (Standard 2.C)*

Do the course learning outcomes link to program learning outcomes?

- Do the credit hours awarded and expectations for student work time (in and out of class) consistent with NWCCU's and the institution's Credit Hour Policy?
- Is the modality or timeframe of the course identified?

#### *Credit Hour Policy*

- Is the institution's credit hour policy attached?
- Does the institution's credit hour policy adequately outline the amount of time students are expected to work on-line and off-line for the number of credit hours awarded?
- Is the institution's credit hour policy included in the proposal?

#### *Educational Effectiveness (Standard 2.C.1, 2.C.4, 2.C.12, 2.C.15; Standards 3 and 4)*

- Does the curriculum progress from introductory to advanced levels?
- Are all learning outcomes in the curriculum achieved at an advanced level by the time the student has completed all courses in the program?
- Does the assessment plan clearly outline the annual plan for assessing the program, as well as the individuals responsible for conducting the assessment and ensuring that information learned from the assessment is used to make improvements to the program?
- Does the assessment plan include direct and indirect measures and does it include both formative and summative assessment?
- Is achievement of all program learning outcomes assessed?
- Is the program included in the institution's program review process?
- Does the institution have a clear process for follow-up with sufficient accountability?
- Is teaching effectiveness evaluated in any means other than a student evaluation?

#### *Faculty (Standard 2.B, 2.C, and 2.D)*

- Are the number of FT and PT faculty dedicated to the program clearly identified?
- Are plans for faculty hires included as enrollment grows?
- Does the proposal indicate how many students each faculty member will advise?
- Does the proposal explain the faculty workload expectations and the impact the proposed program will have on faculty workload?
- Are faculty CVs limited to no more than 5 pages each?

#### *Library/Information Resources (Standards 2.C.6 and 2.E)*

- Are information literacy competencies clearly articulated (for undergrad programs only)?
- Is the assessment of information literacy competency explained?

#### *Finances (Standard 2.F)*

- Does the budget cover the first three years of the program?
- Are assumptions included in the budget?
- Does the budget include student and faculty number and FTE projections? Is a realistic student retention rate identified?
- Does the budget reflect true costs of launching and sustaining the program in areas such as marketing, IT, library, student support services, especially where increases in these areas are anticipated to be needed?
- Is the budget specific to the program being proposed?

#### *Teach-Out (Standard 2.D.4)*

- Is the institution's teach-out or program discontinuation policy attached?

### *General Education (Standard 2.C.9-11)*

- Is the curriculum appropriate to the degree level?
- Are the general education/related instruction courses clearly labeled as such?

### *Graduate Faculty (Standard 2.C.12-15)*

- Do faculty teaching in the program have advanced degrees that qualify them to teach at the level being proposed?
- Are faculty qualified to teach and support all aspects of a doctoral program? Do their CVs reflect an appropriate history of research and scholarly activity for the proposed program?
- How will faculty be selected, inducted, mentored, and evaluated for the proposed program? What is the professional development plan to support faculty as instructors, advisors, and scholars?
- Who will actually be assigned to teach in the program? (full or part time?)
- Are faculty workload issues clearly outlined, including release time for advising theses or dissertations?

### *Graduate Culture (Standard 2.C.12-15)*

- How will a graduate culture be developed and sustained?
- For doctoral programs, how does the institution propose to develop or sustain an appropriate doctoral culture (professional or research doctorate?) How is the nature of the research environment and expectations for both faculty and students described and is this appropriate to the doctoral level?
- How will the institution support faculty scholarship?
- Are opportunities for research and professional development available for students as well as faculty?

## **Distance Education Programs**

### *Curriculum (Standard 2.C)*

- How are students qualified and prepared for the online program?
- Is the plan for developing the 100% online program clear, including prerequisites and electives?
- How will a graduate culture be developed and sustained in an online environment?
- Are technology requirements for students clearly outlined?
- For undergraduate programs, are all of the General Education courses available online?

### *Syllabi (Standard 2.C.1, 2.C.2, 2.C.4, 2.D.4)*

- Have syllabi been fully adapted to an online learning environment, including faculty/student interactions, student/student interactions and use of a variety of resources available online?
- What are the expectations of student participation in online discussions and how are they evaluated?
- Do syllabi for online courses reflect F2F syllabi, or has there been considerable reworking to truly reflect the online delivery modality, including outcomes specific to online delivery?
- Do the syllabi reflect the institution's credit hour policy regarding the amount of time required to complete the course?

### *Faculty (Standard 2.B, 2.C and 2.G)*

- Do faculty CVs show previous online teaching experience?
- What training and support is provided for the faculty to teach in the online modality, initially and ongoing?
- Who will actually be assigned to teach in the program? (full or part time?)
- Is there a recognition in determining faculty workloads that online courses require additional time

- as compared to F2F?
- Has the institution developed guidelines for distance education?

*Assessment (Standard 2.B.1-5, 2.G; and Standard 4)*

- Do the assessment plans specifically address the modality, including the course management system?
- Is information included about what has been learned from other distance ed programs in other Schools and programs in earlier reviews?
- How will faculty be assessed in the online environment other than student evaluations?
- How has the use of online technologies been incorporated in the program's learning outcomes?
- Are there plans to compare on-campus and distance ed models of the same program?
- How will the program monitor student attrition?

*Support Services (Standard 2.D, 2.E, and 2.G)*

- Are support services for distance education students available at a level comparable to those provided to F2F students (library resources, advising, financial aid, career services, etc)?
- How will the institution respond to students who appear to be struggling with learning in the online environment?
- Are helpdesk services available to remote or working students at hours that are convenient to them? Is there a student handbook specifically geared to the online student?
- Is the technology support at the institution sufficient to support an on-line modality?

*Budget (Standard 2.F)*

- Does the budget include the expense of converting F2F courses to the online modality?
- Is the expense of technology support for the program included in the budget (direct or indirect)?

*Credit Hour Policy (Standard 2.C.1 and 2.C.4)*

- Does the institution's credit hour policy adequately outline the amount of time students are expected to work on-line and off-line for the number of credit hours awarded?
- Is the institution's credit hour policy included in the proposal?