



**NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES  
COMMISSION ON INSTITUTIONS OF HIGHER EDUCATION**

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## **Policy on Substantive Change**

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The nature and scope of an educational institution are defined in its legal charter and in formal statements of mission and objectives prepared by the institution.

The accreditation of an institution is in part an affirmation that the institution has established conditions and procedures under which its purposes can be realized and appears in fact to be accomplishing those purposes. The accreditation of an institution applies to those units and activities reviewed at the time of evaluation and included in the institutional report which is a part of each accreditation process required by the Commission on Institutions of Higher Education.

Educational institutions are, of course, constantly changing. Most changes, such as developing new majors or concentrations, changing personnel, and adding and dropping courses, fall within the nature and scope of the institution and do not affect its accredited status. They are, however, one reason for the periodic reexamination required of all accredited institutions.

Other changes, however, affect significantly the nature of the institution, its mission and objectives, its educational program, and the allocation of its resources. Such substantive changes initiated subsequent to the most recent evaluation are not automatically included in the institution's accreditation. While the decision to modify an institution is an institutional prerogative and responsibility, accreditation is that of the Commission. The Commission supports and encourages innovation and experimentation; it also has the obligation to determine the effect of substantive changes on the validity of an institution's accreditation.

### **A. Types of Substantive Change**

Substantive changes include, but are not limited to, the following:

1. changes in legal status or in form of control of the institution, including merging with another institution and changes in ownership;

2. introducing courses or programs at a degree level above or below that at which accreditation is held (see “Procedures for the Review of Institutions Moving to the Higher or Lower Degree Level”);
3. joining separate units into a single accreditable institution, or dividing an institution into two or more separately accreditable units;
4. changes in geographical setting, including removal of an institution to a new location or establishment of an instructional location or branch campus (see Policy on the Review of Off-Campus Programming) or establishing a branch campus or instructional location abroad which enrolls students in credit-bearing instruction leading to a degree, certificate, or other forms of academic recognition;
5. the acquisition of any other institution or any other program or location of another institution;
6. 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;
7. establishing external degree programs;
8. establishing a joint, dual, or concurrent degree with a non-regionally accredited institution, or in a field of study, degree level, or mode of delivery not previously included in the institution’s accreditation.
9. engaging another organization (as by contract) to provide direct instructional services (see Policy on Contractual Arrangements Involving Courses and Programs);
10. establishing electronically offered degree programs (see Policy on Review of Electronically Offered Degree Programs)
11. dropping or reducing programs to an extent that the institution's mission is not being accomplished;
12. adding 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 institution was most recently evaluated, such as distance learning or correspondence courses;
13. changing from clock hours to credit hours or vice versa;
14. substantially increasing
  - (a) the number of clock or credit hours awarded for successful completion of a program; or

(b) the length of a program;

15. significantly departing from the stated mission, population served, objectives or educational programs operative at the time of the most recent evaluation.

The decision as to whether a change is substantive is a judgment specific to an individual institution, since the change must be considered in the context of the whole institution. The Director of the Commission is authorized to decide whether a change is substantive or not; an affected institution may appeal the Director's decision to the Commission on Institutions of Higher Education.

The Commission recognizes that some changes, while affecting the mission and objectives, scope, or form of control of an institution, are of such limited extent that they may be approved by the Director without the necessity of the full evaluation procedure outlined below in "Accreditation Procedures for Substantive Changes." Nonetheless, the Commission wishes to be informed of such limited changes; changes approved as limited changes will be examined as part of the next evaluation of the institution by the Commission.

In approving a limited change, the Director may impose reasonable conditions on the institution, such as prescribing the form of disclosure of the true nature of a change or the relationship of new courses or programs to other offerings of the institution. While a full evaluation is not required for a limited change, it may be necessary to provide for an on-site visit by a member of the Commission's staff, or by a small team of evaluators. Institutions will be required to pay the evaluation fee covering the direct cost if such visits are required. The time for the next institutional evaluation may be rescheduled as a consequence of initiating a limited change.

## **B. Accreditation Procedures for Substantive Changes**

### 1. Notice to the Commission

- a. Prior to Change. An institution considering or planning a substantive change must notify the Commission early in the institution's planning. Implicit in this notice will be a request for a visit by a member of the Commission's staff for discussion of plans and procedures. Such notification will provide an opportunity for an institution to seek from the Commission consulting services that may lead to an advisory opinion on its plans, and counsel about the effect of the change on the accreditation status and the procedures to be followed.
- b. Upon Commitment to Change. If an institution decides to proceed with the change, it must provide a report to the Commission *at least six months* prior to the date of its implementation or in the case of branch campuses, in sufficient time for Commission review before the activity is initiated. (See Policy on the Review of Off-Campus Programming.) In all cases, the institution should document the

approval of the proposed change by any required state review before the Commission will consider the proposed change.

The report will include the following:

- (1) A summary of the proposed change, including a timeline;
- (2) Justification of Changes. A detailed description and analysis of the change, including
  - (a) approval by the institution's governing board;
  - (b) authorization by the appropriate state, private, and/or independent board(s). Information about the following items should be included:
    - (c) purpose of change, relationship of change to development of the institution in terms of need and clientele to be served, timetable for implementing the change;
    - (d) descriptions of changes in program or institutional design;
    - (e) faculty and staff needs for initiation of changes, qualifications of faculty;
    - (f) library and other learning resources and facilities required for change;
    - (g) physical plant expansion and equipment required for the change;
    - (h) indication of financial support available and projection of needs over the next few years, including estimates of additional costs resulting from the substantive change in the institution;
    - (i) if the proposed change involves the offering of programs or courses via distance education, indication that the institution has followed the "Guidelines for the Evaluation of Distance Education (On-Line Learning)."
    - (j) if the proposed change involves assuming responsibility for a certificate or degree program currently being offered by another institution, the institution proposing the substantive change will include documentation that the change is being made with the concurrence of the first institution.
- (3) The fiscal and administrative capacity of the institution to oversee and assure the quality of the proposed change;
- (4) Projection of Future Developments. A brief look at the future, indicating any general developments anticipated in terms of the institution and/or the substantive change.

The report should go beyond description to include analysis and evaluation. Assessment of institutional strengths, concerns, suggested responses to concerns identified, and long-range plans should be included. For some types of change, including moving to the higher or lower degree, the Commission may specify a particular report format.

## 2. Evaluation by the Commission

Upon receipt of the report, the Commission will schedule its review of the change, the scope of its evaluation to be determined by the magnitude of the change and the need to measure its impact on the total institution. The Commission may act to:

- a. require a focused visit or other measures to ensure adequacy of information on which to base a decision (In cases where the substantive change is a change in ownership, a site visit will be taken as soon as practicable, but no later than six months after the change in ownership.);
- b. require a comprehensive evaluation involving the entire institution (In cases where the substantive change is a change in ownership or control, a comprehensive evaluation will be scheduled no later than three years after the change in ownership or control.);
- c. approve the change without conditions;
- d. approve the change with conditions specified;
- e. defer consideration, pending receipt of additional information;
- f. disapprove the proposed change.

## 3. Determination of Status

Only after a determination by the Commission of the acceptability of the institution's plans may the institution consider such substantive changes not to have affected the validity of its institutional accreditation.

If the institution's plans are approved, the Commission will specify an effective date, which is not retroactive, on which the change is included in the institution's accreditation.

If the plans are disapproved, the Commission will provide reasons in communicating the decision to the institution. The institution may address the reasons and submit revised plans, asking that the Commission give new consideration to the revised plan.

If the institution's plans are disapproved and the institution proceeds, the institution is obliged to notify the Commission it has proceeded. In proceeding with the plans

disapproved by the Commission, the institution has placed its accreditation at risk, and the Commission will take further action. In addition, the institution must state in its publicity that the change is not included within the institution's accreditation.

During any change the institution should take the steps necessary to assure an orderly transition consistent with the policies and procedures of the Commission.

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