

Substantive Change Manual

A Guide to Substantive Change

Published by the Northwest Commission on Colleges and Universities

July 2023

www.nwccu.org

Preface

The Northwest Commission on Colleges and Universities (NWCCU) requires **prior approval** of all institutional portal updates, portal notifications, Minor, and Major substantive changes as outlined in this manual. Substantive changes include high-impact, high-risk changes that could affect the capacity of the institution to meet NWCCU's Standards for Accreditation, Eligibility Requirements, or Policies.

NWCCU is committed to ensuring high quality educational programs are offered by its member institutions. Any changes in educational programs, teaching modalities, delivery locations, contracts, scope of offerings, and control of the institution are aligned with the NWCCU Standards for Accreditation, as mandated by the U.S. Department of Education.

The U.S. Department of Education (USDE) regulations require that accrediting agencies maintain adequate substantive change 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 their accreditation standards. Federal law mandates that accrediting agencies require institutions to obtain approval of the substantive change prior to its inclusion in the scope of accreditation or pre-accreditation previously granted to the institution.

Substantive changes submitted by an institution that has been placed on a Sanction of *Warning*, *Probation*, or *Show Cause* may require additional reviews or site visits.

NWCCU's procedures include effective mechanisms for conducting:

- Visits at reasonable intervals to institutions that operate more than three additional locations, similar to those conducted during the Year-Seven Evaluation of Institutional Effectiveness.
- Visits at NWCCU's discretion for ensuring that institutions which experience significant growth in the number of additional locations maintain educational quality.

The procedures defined in this manual provide guidelines for institutions to demonstrate compliance with these regulations, as well as other NWCCU requirements.

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Section One: Substantive Change Policy and Procedures

Overview of NWCCU's Substantive Change Policy

As described in the [Substantive Change Policy](#), and pursuant to Federal Regulations 34 CFR 602.22, NWCCU monitors proposed high-impact or high-risk changes by an institution to ensure that a substantive change to the educational mission, objectives, or programs does not adversely affect the capacity of the institution to continue to meet the NWCCU Standards for Accreditation, Eligibility Requirements, and/or Policies.

Whenever an accredited or candidate institution plans a substantive change in its academic programs, mission, scope, ownership, form of control, area served, or other significant matters that could potentially have an impact on the resources and capacity of the institution, NWCCU requires the institution to submit a substantive change proposal. NWCCU's Substantive Change Policy has been developed to ensure that new programs, modalities, and other important changes are made in keeping with the Standards for Accreditation. This manual outlines the processes and procedures. Additionally, a list of NWCCU policies and other resources related to substantive changes can be found in Appendix 1. Appendix 2 provides a listing of frequently asked questions and common issues with substantive change proposals.

Noncompliance with Substantive Change Policies

Candidate and accredited institutions are responsible for developing internal procedures to ensure compliance with the Commission's Substantive Change Policy and procedures outlined in this manual, and to guarantee that new sites, programs, or other changes are not initiated nor advertised without obtaining the necessary prior approval. Such off-campus and/or distance education programs or sites are eligible for federal financial aid only after they are recognized and approved through the NWCCU's substantive change process.

If the Commission determines that a site or program has been advertised or 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 advertised or 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 non-compliance 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 Peer Review Panel reviews this information, the matter will be forwarded to the NWCCU Board of Commissioners to determine if a sanction should be imposed for violation of the institution's responsibilities under Eligibility Requirement 21: *Disclosure* and/or Eligibility Requirement 22: *Relationship with NWCCU*.

Institutions on Sanction

If an institution has been issued a sanction by the Commission (Warning, Probation, or Show Cause) over the prior three academic years, they **must receive prior approval** for the following changes:

1. A change in an existing program's method of delivery, i.e, on-campus, distance, or hybrid/HyFlex.
2. An aggregate change of 25% or more of the clock hours, credit hours, or content of a program since the agency's most recent accreditation review.
3. The development of customized pathways or abbreviated or modified courses or programs to:
 - Accommodate and recognize a student's existing knowledge, such as knowledge attained through employment or military service; and
 - Close competency gaps between demonstrated prior knowledge or competency and the full requirements of a particular course or program.
4. Entering into a written arrangement under 34 CFR 668.5 under which an institution or organization not certified to participate in the Title IV, HEA programs offers up to 25% of one or more of the accredited institution's educational programs.

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.

Substantive Change Categories

There are three change categories required by NWCCU associated with each level of review.

Program Inventory Updates: These updates can be completed by logging into the institutional portal or submitting a notification through the online submission. The institution will not receive a letter of approval for these changes. These changes fall under the category of program maintenance.

Minor Substantive Change Requiring Staff Review: These Minor substantive changes are reviewed and approved by the NWCCU Staff Liaison. Some changes may require additional post-implementation site visits. A Minor change has minimal impact on the resources and capacity of the institution. Most changes, such as adding programs that are aligned with existing offerings, terminating programs, or changes in method of instructional delivery, are categorized as Minor changes.

Major Substantive Change Requiring Panel Review: Major substantive changes are reviewed by a Peer Review Panel and must be approved by the Executive Committee of NWCCU's Board of Commissioners. Some changes may require additional pre- or post-implementation site visits. A Major change has significant impact on the resources and capacity of the institution. A Major change is of a magnitude that could alter an institution's mission, objectives, and institutional planning; 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 at international locations or in partnership with unaccredited institutions; 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% of an educational program.

Program Inventory Updates

Program Inventory Updates consist of Portal Updates and Portal Notifications. For all **Portal Updates**, the institution's ALO (or ALO Delegate) can edit the program records in the institution's academic program list displayed on the **Programs tab** of the institutional portal. The following changes can be made using the institutional portal:

- Update program name
- Update Number of Credits
- Update CIP Code
- Change program status to Suspended or Terminated
- Indicate Distance Education Delivery
- Indicate Face-to-Face Delivery

While editing program records is simple using the institutional portal, these changes require submission **prior** to implementation. Changing a program record through the institutional portal will cause an institution's NWCCU Staff Liaison to be notified to review and approve the change. If there are questions or concerns, the NWCCU Staff Liaison will contact the institution's ALO for more information. There is no acknowledgement email following programmatic changes made via the institutional portal. Most Portal Updates are approved in the *institutional portal* within 30-days of submission, except for those requiring additional information.

For all **Portal Notifications**, the institution's ALO (or ALO Delegate) can submit a Notification through the portal. *Notifications are another area of updates that* apply to the following categories of changes:

- Adding new academic programs that **do not** represent a significant departure (less than 25% aggregate change) from programs previously approved.
- Closing or suspending additional locations.
- Entering into a contractual agreement for education-related services with an institution accredited by a U.S. Department of Education recognized accreditor that provides any portion of the institution's educational programs.
- Adding a third or more additional domestic location, prison education program, or international location where at least 50% of an educational program is offered.

Similar to changes associated with *Portal Updates*, Portal Notifications will not receive an email acknowledgement. The NWCCU Staff Liaison is alerted to the submission and will review the information. If the submission is complete and in accordance with NWCCU Standards for Accreditation and Substantive Change Policy, the NWCCU Staff Liaison will denote the change as approved in the institutional portal. Once the change is converted from requested to an “Approved” status in the program record in the institutional portal, the institution may move forward with implementing the requested change. The status of program records is visible in the Programs list of the institutional portal. Most *Notifications* are approved in the institutional portal within 30 days of submission, except for those requiring additional information.

Program Inventory Updates	Review Level	Considered a Substantive Change?	Fee
Renaming a program	Portal Update	No	∅
Updating a CIP Code	Portal Update	No	∅
Changing the number of credits associated with a program (less than 25% aggregate change)	Portal Update	No	∅
Suspending, terminating, or placing into moratorium existing Title IV eligible academic programs	Portal Update	No	∅
Changing an existing program’s method of delivery at an institution previously authorized for distance education	Portal Update	No	∅
Adding new academic programs, including Title IV-eligible degree/certificate/diploma programs, that do not represent a significant departure (less than 25% aggregate change) from programs previously approved	Notification Portal Submission	No	∅
Closing or suspending an existing additional location (teach out plans and agreements are required for permanent closures)	Notification Portal Submission	No	∅
Entering into a contractual agreement for education-related services under which an institution that is accredited by an accreditor recognized by the U.S. Department of Education provides any portion of one or more of the institution’s educational programs provided by an accredited institution ¹	Notification Portal Submission	No	∅
Adding a third or more additional domestic location, prison education program, or international location where at least 50% of an educational program is offered	Notification Portal Submission	No	∅

¹ See [Contracts for Education-Related Services Policy](#) for more information

Minor Substantive Changes

For substantive changes under the **Minor Substantive Change** category, your NWCCU Staff Liaison will review for approval or disapproval. These categories of review require a fee and take 30 to 60 days to complete, following submission of a materially complete proposal.

	Minor Substantive Change Staff Review	Change Type	Review Level	USDE Reference	Fee*
1	Adding program content, or academic program(s), including Title IV-eligible certificate programs, that represent a significant departure (25% or more aggregate change) from program(s) or related programs previously approved	Minor	Staff review	602.22(a)(1)(ii)(C)	\$1,000
2	Changing institutional prior learning procedures to accommodate a customized pathway or modifications of programmatic content to support learning outcomes ²	Minor	Staff review	602.22(b)(3)(i-ii)	\$1,000
3	Initiating distance education delivery of any portion of an academic program, for institutions not currently authorized to deliver distance education ³	Minor	Staff review	602.22(a)(1)(ii)(C)	\$1,000
4	Substantially changing the number of clock or credit hours awarded for successful completion of a program (25% aggregate change of total program credits or clock hours)	Minor	Staff Review	602.22(a)(1)(ii)(F)	\$1,000
5	Changing an institutional annual calendar system including semester, trimester, quarter, block, or competency-based units	Minor	Staff Review	602.22(a)(1)(ii)(E)	\$1,000

² 602.22.(b)(3)(i-ii) customized pathways or abbreviated or modified courses or programs intended to: accommodate and recognize a student's existing knowledge (such as attained through employment or military experience; close competency gaps between demonstrated prior knowledge or competency and the full requirements of a particular course or program

³ First program only is reviewed as Minor change and required to be authorized - then all subsequent additions are portal updates.

	Minor Substantive Change Staff Review	Change Type	Review Level	USDE Reference	Fee*
6	Entering into a contractual agreement for education-related services under 34 CFR 668.5 under which an institution or organization not certified to participate in Title IV programs and offers more than 25% but less than 50% of one or more of an accredited institution's educational programs ⁴	Minor	Staff Review	602.22(a)(1)(ii)(J)	\$1,500
7	Initiating or expanding Competency-Based Education (CBE) where 50% or more of the courses or credits in an academic program are provided using CBE	Minor	Staff Review	602.22(a)(1)(ii)(C)	\$1,500
8	Changing an existing program from clock to credit hours (or vice versa)	Minor	Staff Review	602.22(a)(1)(ii)(E)	\$1,500
9	Adding the 2 nd and 3 rd academic programs at a degree or credential level not previously included in the institution's accreditation or candidacy/pre-accreditation by NWCCU	Minor	Staff Review	602.22(a)(1)(ii)(C)	\$1,500
10	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	Minor	Staff Review	602.22(a)(1)(ii)(H)	\$1,500

*Please refer to NWCCU's Dues and Fees page for the latest information

⁴ See [Contracts for Education-Related Services Policy](#) for more information.

Major Substantive Changes

For substantive changes under the **Major Substantive Change** category, a three-person peer review panel is convened, with expertise consistent with the institution’s mission or substantive change. The peer review panel undertakes analysis of resources and capacity to implement the proposed change. A peer review panel may request additional or clarifying information. The peer review panel will complete its review and make a recommendation to the Executive Committee of the NWCCU Board of Commissioners who will make the final determination for approval or disapproval. These categories of review require a fee, and take three to six months to complete from the submission of a materially complete request.

	Major Substantive Change Panel Review	Change Type	Review Level	USDE Reference	Fee*
11	Initiating or expanding Direct Assessment delivery where 50% or more of the courses or credits in an academic program are provided using direct assessment	Major	Panel Review	602.22(a)(1)(ii)(K)	\$1,500
12	Acquiring or merging any program of another institution <i>(Post-implementation visit <u>may be required</u> within six months of implementation.)</i>	Major	Panel Review	602.22(a)(1)(ii)(G)	\$1,500
13	Establishing an additional location or branch campus where 50% or more of the program requirements can be earned via face-to-face instructional delivery (First two locations only) ⁵ <i>(Post-implementation visit <u>is required</u> within six months of implementation.)</i>	Major for first two locations	Panel Review	602.22(a)(1)(ii)(I) 602.22(f)	\$1,500
14	Establishing a Prison Education Program (First two locations only) <i>(Post-implementation visit <u>is required</u> within six months of implementation.)</i>	Major	Panel Review	602.22(a)(1)(ii)(I) 602.22(f) 668.237(b)	\$1,500
15	Establishing an International location where 50% or more of the program requirements can be earned via face-to-face instructional delivery (First two locations only) <i>(Post-implementation visit <u>is required</u> within six months of implementation.)</i>	Major	Panel Review	602.22(a)(1)(ii)(I) 602.22(f)	\$1,500
16	Adding the first academic program at a degree or credential level not previously included in the institution’s	Major for first program	Panel Review	602.22(a)(1)(ii)(D)	\$1,500

⁵ A visit, within six months, to each additional location the institution establishes, if the institution 1) has two or fewer additional locations; 2) has not demonstrated the additional location is meeting the standards; and/or 3) has been placed on warning, probation, or show cause.

	Major Substantive Change Panel Review	Change Type	Review Level	USDE Reference	Fee*
	accreditation or candidacy/pre-accreditation by NWCCU <i>(Pre-implementation visit <u>may be required</u>. Post-implementation visit <u>may be required</u> within six months of implementation.)</i>				
17	Substantial change in institutional mission, objectives of the institution, or programs offered <i>(Pre-implementation visit <u>may be required</u>. Post-implementation visit <u>is required</u> within six months of implementation.)</i>	Major	Panel Review	602.22(a)(1)(ii)(A)	\$1,500
18	Change in the legal status, form of control, or ownership of the institution <i>(Pre-implementation visit <u>may be required</u>. Post-implementation visit <u>is required</u> within six months of effective date of change.)</i>	Major	Panel Review	602.22(a)(1)(ii)(B)	\$10,000
19	Acquiring or merging with another institution or location of another institution <i>(Post-implementation visit <u>is required</u> within six months of implementation.)</i>	Major	Panel Review	602.22(a)(1)(ii)(G)	\$20,000

*Please refer to NWCCU’s Dues and Fees page for the latest information.

Dues and Fees

Evaluator expenses and applicable site visit fees will be charged to the institution. Please refer to the current NWCCU [Schedule of Dues and Fees](#) associated with Substantive Changes. Institutions receive 10 free substantive changes from select categories. Please contact your NWCCU Staff Liaison for more information.

An institution may submit a request for an expedited review. For Minor Substantive change submissions, an expedited review occurs within 14 business days of receipt. However, during the months of April and October reviews will not be conducted by the NWCCU Staff Liaisons. For Major Substantive change submissions, an expedited review occurs within 90 business days of receipt. Expedited reviews are at the discretion of NWCCU.

Institutions must consult with their NWCCU Staff Liaison 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 NWCCU.

Categories of Changes

For all categories of change, please contact your NWCCU Staff Liaison if you have any questions about the potential category of submission and its associated requirements.

Program Inventory Updates

An ALO or ALO Delegate can make program inventory updates through the institutional portal and/or the notification process. If you are uncertain about whether your change falls under this category, please consult with your NWCCU Staff Liaison.

Renaming a program

Changing the name of an approved program is considered a program record update unless other significant changes (greater than 25%) have been made to the curriculum or length of the program. Institutions should notify NWCCU through the portal 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 with your NWCCU Staff Liaison.

Updating a CIP Code for a program

Changing the CIP Code of an approved program is considered a program record update and can be done through the portal.

Changing the number of credits of a program

Changing the number of credits associated with a program that represents less than 25% aggregate change (either an increase or decrease) to the existing program can be done through the portal.

Suspending, terminating, or placing a program in moratorium

An institution can change the status through the program portal of a program placed in moratorium, suspended, or terminated. You must provide a response as to how the students remaining in the program are being taught out and supported through to completion of their degree requirements. If there are no students currently enrolled in the program, please indicate such. Additional information is available in the [Procedures to Close a Program, Branch Campus, or Institution Policy](#).

Moratorium – means to pause enrollment for incoming students in a program, with the idea that there is a potential to begin re-enrolling students in the program at a future date (less than five years).

Suspending – means to cease enrolling incoming students into a program with the express intent to terminate the program at the conclusion of any teach-out of the existing students enrolled in the program.

Terminating – means there are no longer students enrolled in the program, and the program will be closed indefinitely.

Changing an existing program's method of delivery

Once an institution has been authorized to deliver programs via distance delivery, they may change a program's method of delivery (from face-to-face to distance delivery or vice versa or hybrid) in the program portal.

Adding a new program that does not represent a significant departure

Adding a program that is not a significant departure from an institution's currently approved curricular offerings requires notification to NWCCU. The institution should identify the existing, closely related program(s) that demonstrates the new program is not a significant departure (less than 25%) from programs previously approved. You must provide information on the percentage of new versus existing courses. If the staff determines that the program is a significant departure (greater than 25%), the institution will be notified and required to submit a proposal to be reviewed. If there is any doubt as to whether a new program is a significant departure from current offerings, please consult with your NWCCU Staff Liaison in advance of submission.

Closing or suspending an existing additional location

Closing or suspending an existing additional location requires notification to NWCCU, along with a teach-out plan. The institution must address how the students remaining in the program(s) at the additional location are being taught out and supported through to completion of their degree requirements. If there are no students currently enrolled in the program(s), please indicate such. Additional information is available in the [Procedures to Close a Program, Branch Campus, or Institution Policy](#).

Entering into a contract with an accredited institution

Entering into a contractual agreement for education-related services under which an institution accredited by an accreditor recognized by the U.S. Department of Education provides any portion of one or more of the institution's educational programs requires notification to NWCCU. A contract for education-related services can be one offered through a consortium agreement collaboratively by two or more accredited institutions and leads to the award of a separate degree from each of the participating institutions.

Contracts for education-related services 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 percent of the program for the other consortium partner; or
- Either institution's degree is a significant departure from programs previously evaluated by NWCCU.

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

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 Commission will decide whether a site visit is necessary during the review of the substantive change proposal in this case.

Adding a third or more additional domestic location, prison education program, or international location

Note that the USDE requires that NWCCU must be made aware of and maintain addresses of all instructional sites geographically separate from the main campus at which 50 percent 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. For the purposes of

categorizing substantive changes, an additional location more than 20 miles in distance from the main campus is considered geographically apart from the main campus, however, all street addresses for all sites must be recorded by NWCCU. This practice does not preclude submission of a notification for an additional location within a 20-mile distance or for instructional sites for which less than 50 percent of a program is offered.

Once an institution has successfully completed at least one cycle of accreditation and has received NWCCU approval for the addition of at least two additional locations, it may add a third or more domestic location, prison education program, or international location through the Portal Notification.

Minor Changes

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 NWCCU Staff Liaisons who are senior staff designated by the Board of Commissioners to approve or disapprove Minor substantive changes. They will follow a timeline of approximately 30 to 60 days. NWCCU reserves the right to refer any proposal to a Substantive Change Peer Review Panel for review. Examples of significant departures include an offering in a curricular area in which the institution has no current approved programs. If there is any doubt as to whether a new program is a significant departure from current offerings, please consult with your NWCCU Staff Liaison.

1. Adding program content or academic program(s) that represent a significant departure

This category includes programs at a degree level where those programs represent a significant departure from an institution's existing offerings. NWCCU utilizes the USDE's definition of a program as leading to "an academic, professional degree, certificate, or other recognized educational credential." The initiation of a few new courses without an associated educational credential do 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.

An example of a new program that represents a significant departure from current offerings: a certificate in accounting offered by an institution that has no existing business programs.

Non-Degree Program Requirements

Institutions are required to notify the Commission of new credit-bearing, non-degree programs (including Title IV-eligible) that 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.
-

2. Institutional prior learning outcomes

This category includes the implementation of use of prior learning in the development of customized pathways or abbreviated or modified programs for two specific purposes (34 CFR 600.22(b)(3)(i-ii):

- (i) Accommodate and recognize a student's existing knowledge, such as knowledge attained through employment or military service; and
- (ii) Close competency gaps between demonstrated prior knowledge or competency and the full requirements of a particular course or program.

3. Distance education program

The first proposed distance education program at an institution requires an in-depth evaluation of the institution's capacity to deliver distance education. Institutions found to have the resources and capacity to successfully deliver distance education will be **authorized** for distance education. Additional requests to deliver any portion of programs via distance education require NWCCU approval via the institutional portal. Please see the [Distance Education Policy](#) for more detailed information on NWCCU expectations regarding programs delivered in this modality.

USDE defines Distance Education [34 CFR 600.02] as:

Education that uses one or more of the technologies listed in paragraphs (2)(i) through (iv) of this definition to deliver instruction to students who are separated from the instructor or instructors and to support regular and substantive interaction (see USDE definition) between the students and the instructor or instructors, either synchronously or asynchronously.

The technologies that may be used to offer distance education include:

- The Internet;
- One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
- Audio conference; or
- Other media used in a course in conjunction with any of the technologies listed above.

There are two steps involved in getting a program approved for distance delivery:

1. **Institutional Authorization:** Before an institution can begin offering programs via distance delivery, NWCCU must determine that the institution has the resources and capacity to offer effective instruction via distance education.
2. **Program Approval:** NWCCU must approve each program to be taught via distance education for the first time.

Step 1: Institutional Authorization

Obtaining authorization to deliver programs via distance education requires NWCCU to determine that your institution has the resources and capacity to offer effective distance education courses. Specifically, we check to ensure that the requirements of the NWCCU Distance Education Policy are being met:

- Distance education programs are consistent with the mission and educational objectives of the institution.
- Distance education programs are integrated into the regular planning processes of the institution.
- The institution provides sufficient resources – financial, human, physical, technology – to

support its distance education programs.

- Faculty have the necessary skills or will receive training to teaching distance education courses.
- Operation of distance education programming is incorporated into the governance system of the institution.
- The institution's academic unit exercises oversight of distance education programs, ensuring both the rigor of the program and the quality of instruction.
- Courses and programs offered via distance education maintain the same academic standards as those offered on the main campus.
- On-campus faculty have a substantive role in the design and implementation of distance education programs.
- The institution evaluates the educational effectiveness of each distance education program, including assessment of student learning outcomes, student retention, and student and faculty satisfaction, to ensure comparability to campus-based programs.
- Students enrolled in distance education programs have adequate access to and make effective use of learning resources, including library, information resources, laboratories, and equipment.
- Students enrolled in distance education programs have adequate access to student services, including financial aid, academic advising, course registration, and career and placement counseling.
- Publications and advertising for distance education programs are accurate and contain necessary information such as the program's goals, requirements, academic calendar, and faculty.
- Contractual relationships (e.g., Online Program Management (OPM) organizations) and arrangements with consortial partners, if any, are clear and guarantee that the institution maintains direct and sole responsibility for the academic quality of all aspects of distance education programs. Where the institution has entered into contractual relationships involving credits and degrees, it has obtained Commission approval for the substantive change.

Additionally, in keeping with federal requirements, an institution offering distance education programs must:

- Have in place effective procedures to ensure that the student who registers in a distance education course or program is the same student who participates in and completes the course or program and receives the academic credit;
- Have in place effective procedures to ensure the security of student records;
- Clearly communicate to the student that these processes protect student privacy; and
- Notify students at the time of registration and enrollment of any projected additional student charges associated with the verification procedures.

Institutions seeking Authorization to offer distance education must submit a Minor substantive change proposal addressing each of the Requirements in the list above and describing how the institution has or will meet each requirement.

Step 2: Program Approval

Once an institution is Authorized for Distance Education, the institution must still obtain approval from NWCCU for each program to be offered via distance education.

- New academic programs (distance or face-to-face) must be submitted for review using the standard Substantive Change process.
- This substantive change notification for existing face-to-face programs being made available via distance education can be processed directly via the *Institutional Portal* by the institution's AOL or AOL Delegate.

4. Substantially changing the number of clock or credit hours

If an institution plans to substantially increase or decrease the number of clock or credit hours awarded for successful completion of a program (more than 25 percent of total program credits or clock hours), a Minor change proposal is required. Additional information may be required for a substantial reduction in credit hours. If your institution is seeking a reduction in credit hours, you must also address the following questions:

- I. Address how the student learning experience with general education/free electives at the lower division (200-level or below) and upper division (300-level or above) will be ensured.
- II. Address how the disciplinary depth and breadth will be ensured.
- III. Address what is the expected graduation pathway for this type of degree (i.e., workforce, graduate school, etc.).
- IV. Address what type of review and assessment the institution has done to ensure that the proposed program will not hinder or limit a student's ability to obtain employment, industry certification, and/or apply to graduate school.
- V. Address what type of review and assessment the institution has done to ensure that there are no programmatic or specialized accreditation requirements limiting or impacting the ability to make this change.

5. Changing an institutional calendar system

If an institution plans to change the institutional calendar system (e.g., quarters to semesters), a minor change proposal is required.

6. Entering into a contractual agreement

A contract for education-related services with a non-accredited organization (or not certified to participate in Title IV funding) is one that is offered through a contractual agreement between two or more institutions or with an organization and leads to the award of one degree. The proposal for a contracted degree program must be developed jointly by the partnering institution(s) and non-accredited organization. The NWCCU member institution must provide information concerning the support to be provided and an assessment of the impact the program will have on the institution(s). NWCCU will render a decision on these contractual agreements within 90 days. Please see the NWCCU Policy on [Contracts for Education-Related Services](#) for more detailed information on expectations.

Federal Regulations categorize the type of contract based on the accreditation status of your institution, the accreditation status of the contracted entity (institution or other entity), and the percentage of the academic program to be delivered. Consistent with Federal Regulations regarding substantive change (34 CFR 602.22) and eligibility for participation in Title IV for programs offered by contracted entities (34

CFR 668.5). The chart below illustrates the Federal requirements for various categories and program percentages.

Required Notification and/or Prior Approval for Contracts for Education-Related Services

Category	Fed. Reg.	Your Institution	Other Entity	Percent of Program Offered by Other Entity				
				0%	25%	50%	75%	100%
1	602.22 668.5 (2) (c)	Eligible	Ineligible	Provide copy of contract - Notification	Prior approval required - State must approve first	Not allowed		
2	668.5 (1)	Eligible	Eligible	Provide copy of contract - Notification				
3	668.5 (2)	Eligible	Eligible – same owner	Provide copy of contract - Notification				
4	668.5 (2) (b)	Eligible	Ineligible Institution in another country	Provide list (only) of Study Abroad Contracts	Provide copy of Study Abroad contract - Notification	Not Allowed		

Category 1

Category 1 is a written agreement between your (eligible) institution and an ineligible institution to have the ineligible institution deliver part of one or more of your academic programs. The reporting requirements to NWCCU vary depending on the percentage of the program to be provided by the ineligible institution.

- 25 to 50% – Federal Regulations [34 CFR 668.5 (3)(ii)(C)] require that “the State agency listed in the Federal Register in accordance with 34 CFR part 603 has specifically determined that the institution's arrangement meets the agency's standards for executing a written arrangement with an ineligible institution or organization.” To ensure that this requirement has been met, NWCCU requires prior approval before entering into a written agreement to have a non-eligible entity offer 25-50% of one or more of your educational programs. Additionally, the State agency must approve the written agreement before seeking NWCCU approval.
- 50% or more – Federal regulations do not provide for written agreements with an ineligible institution to deliver 50% or more of one or more of your educational programs. Therefore, such agreements are not allowed by NWCCU.

Category 2

Category 2 is a written agreement between your (eligible) institution and another entity recognized by the U.S. Department of Education as eligible to participate in Title IV. The partnering entity may be another institution or a consortium of eligible institutions. When both partnering entities are eligible, the partner institution (“Other Entity” in the chart) may provide any portion of one or more educational programs at your institution. NWCCU requires you to provide a copy of the written agreement or contract as a Portal Notification, prior to implementation.

Category 3

Category 3 is identical to Category 2, except that both your institution and the other eligible entity are owned by the same organization. This situation is called out in 34 CFR 668.5 (2), but there is no impact on the conclusion: the partner institution (“Other Entity” in the chart) may provide any portion of one or more educational programs at your institution. NWCCU requires you to provide a copy of the written agreement or contract as a Portal Notification, prior to implementation.

Category 4

Category 4 is closely related to Category 1, except the ineligible institution is located outside the United States, and specifically addresses written agreements for Study Abroad programs. NWCCU requirements for reporting these agreements vary depending on the percentage of the program to be provided by the ineligible foreign institution.

- 25 to 50% - NWCCU requires that the eligible institution provide a copy of each contract or written agreement for Study Abroad programs where the ineligible foreign institution will be providing more than 25% of the educational program
- 50% or more – Federal regulations do not provide for written agreements with an ineligible institution to deliver 50% or more of one or more of your educational programs. Therefore, such agreements are not allowed by NWCCU.

Online Program Management (OPM) contracts – OPM contracts are considered contracts for education-related services but may not fall cleanly into the categories of the Federal Regulations since they may not be contracts for delivery of educational programs. If the OPM contract does not have the partnering entity delivering an educational program, assume 0% of the program is delivered by the partnering entity and follow the guidance in the chart.

7. Initiating or expanding competency-based education

Competency-based education utilizes two student learning approaches: course/credit-based and direct assessment.

In a course/credit-based approach, the demonstration of competencies is embedded into a conventional curriculum comprising 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.

In direct assessment, in lieu of credit hours or clock hours as a measure of student learning, a student's knowledge, skills, abilities, and proficiency in the relevant subject area are measured.

An institution is expected to seek prior approval from NWCCU when 50 percent or more of the degree program is awarded on the basis of the assessment of student competencies. A competency-based program at an institution may be subject to a follow-up site visit one year after the program launches.

8. Change from clock hours to credit hours

If an institution changes a program from clock hours to credit hours, a Minor change proposal is required.

9. Adding the 2nd and/or 3rd academic program at a degree or credential level

Adding the second and/or third academic program at a degree or credential level is a Minor substantive change, and proposal is required. The application must address continued resources and capacity to add additional programs at the new degree or credential level.

10. Addition of a permanent location at a site at which the institution is conducting a teach-out for students of 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. Please review the [Procedure to Close a Program, Branch, Campus, or Institution](#) policy.

Major Changes

Some changes reach beyond a particular program or location and affect the institution as a whole. These institutional changes require initial review by a three-person peer review panel with expertise consistent with the institution's mission or substantive change proposal. The peer review panel report with recommendations are considered and voted upon by the Executive Committee of the NWCCU Board of Commissioners. Note that review and approval of Major substantive change proposals may take three to six months to complete. Institutions should consider submitting Major change proposals and [applicable fees](#) six to nine months before they intend to implement the change.

Some Major changes will require a comprehensive review. For a comprehensive review, the institution must complete a self-evaluation report, host a visit by a Peer Evaluation Team that will complete and submit its peer-evaluation report and recommendations to the NWCCU Board of Commissioners. The Commissioners will review the reports and recommendations and take action at their January or June Commission meetings on the institution's accreditation status.

11. Direct assessment degree program

An institution is expected to seek NWCCU, USDE, and state regulatory authority approval when 50 percent or more of the degree program is awarded on the basis of direct assessment of student competencies. Direct assessment is considered a Major substantive change. Consistent with NWCCU's [Direct Assessment and Competency Based Education](#) Policy, direct assessment is an alternative to credit hours as a means of measuring student learning. Direct assessment may be used with residential instruction or as part of distance education. All requirements for regular and substantive interaction between the instructors and the students apply to direct assessment programs.

Direct assessment programs are described in 34 CFR 688.10 (a) as follows:

- A direct assessment program is an instructional program that, in lieu of credit hours or clock hours as a measure of student learning, utilizes direct assessment of student learning, or recognizes the direct assessment of student learning by others. The assessment must be consistent with the accreditation of the institution or program utilizing the results of the assessment.
- Direct assessment of student learning means a measure of a student's knowledge, skills, and abilities designed to provide evidence of the student's proficiency in the relevant subject area.

- An institution must establish a methodology to reasonably equate each module in the direct assessment program to either credit hours or clock hours. This methodology must be consistent with the requirements of the institution's accrediting agency or State approval agency.

12. Acquiring or merging any program of another institution

An institution that is acquiring a program from another institution or merging an existing program with a program at another institution must seek NWCCU approval prior to making the change.

13. Establishing an additional location or branch campus

A facility that is geographically apart from the main campus of the institution and at which the institution offers at least 50 percent of a program at the additional location may be identified as a branch campus, additional location, or other instructional site, as defined below:

- **Branch campus:** An additional location of an institution that is geographically apart and independent of the main campus of the institution. The Secretary considers a location of an institution to be independent of the main campus if the location: (1) Is permanent in nature; (2) Offers courses in educational programs leading to a degree, certificate, or other recognized educational credential; (3) Has its own faculty and administrative or supervisory organization; and (4) Has its own budgetary and hiring authority. [34 CFR 600.2]
- **Additional location:** A facility that is geographically apart from the main campus of the institution and at which the institution offers at least 50 percent of a program and may qualify as a branch campus.
- **Other instructional site:** A facility that does not meet the definition as an Additional Location. Two ways that "Other instructional site" is often used include:
 - Instructional sites that do not meet the 50% threshold for any academic program, such as research field sites.
 - Sites where an institution's programs are offered in another organization's facilities such as high schools.

Branch Campus

The first two branch campuses require a site visit, and the institution must be able to demonstrate:

- Clearly defined academic controls;
- Regular evaluation of the branch campus locations;
- Adequate faculty, facilities, resources, and academic and student support systems;
- Financial stability; and
- Long-range planning for expansion.

Proposals to establish a new branch campus 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.

Once a branch campus is approved with at least one program, an institution may offer any other previously approved on-site programs at that location through notification to the portal. Institutions may call their off-campus sites branch campuses, satellite centers, extension programs, or whatever else they choose. However, if an institution chooses to call a location a branch campus it should meet the federal definition indicated above.

Additional Locations

The first two additional locations require a site visit, and the institution must be able to demonstrate in the proposal that the additional location has the personnel, facilities, and resources needed to operate the additional location.

Institutions that seek approval of four or more off-campus locations in a year are subject to a staff review for significant growth. This review could trigger 1) a special visit to assess growth over the past three years or 2) a comprehensive review to assess the institution's ability to maintain high quality in light of its significant growth. For a comprehensive review, the institution must complete a self-evaluation report, host a visit by a Peer Evaluation Team that will complete and submit its peer-evaluation report and recommendations to the NWCCU Board of Commissioners. The Commissioners will review the reports and recommendations and take action on the institution's accreditation status.

Moving a Main or Branch Campus

Prior to the change in location, an institution is required to seek NWCCU approval to move either its main campus or a branch campus more than 20 miles. 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 appropriate review and consideration.

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.

Evaluation of a Location

Within a seven-year cycle, institutions which have three or more additional locations which have been previously approved will be subject to a selectively chosen site visit at an additional(s) location during the Evaluation of Institutional Effectiveness. The site visit will evaluate clearly identified academic control; adequate faculty, facilities, resources, and academic and student support systems; financial stability; and long-range planning for expansion. Institutions which have two or fewer additional locations and subsequently adds an additional location must host a site visit to the new location if the institution is in a high-risk status or has not satisfactorily met standards for accreditation for additional locations. In addition, institutions experiencing significant growth at additional locations may be requested to host a site visit to ensure educational quality is maintained for additional locations.

14. Establishing a prison education program

Institutions wishing to establish prison education program (PEP) sites must follow these guidelines to be recognized as PEP sites starting July 1, 2023:

The institution should follow these steps:

Step 1. Connect with the Correctional Agency in your state to discuss potential programming for students who are incarcerated. Formalize a partnership agreement via a Memorandum of Understanding (MOU) or a similar arrangement.

Step 2. Once a partnership has been formalized with the correctional agency to provide specific programming, the institution initiates the substantive change process with NWCCU to open a new location and, if appropriate, to offer a new academic program. The first two PEP locations must be approved as new additional locations.

Step 3. After obtaining an agreement with the corrections partner and approval from NWCCU for the new PEP location, the institution must apply to the US Department of Education for an approved PEP.

NWCCU will conduct a site visit within one year of the establishment of the PEP program, this visit may or may not be combined with one of the current NWCCU site visits (Ad Hoc, Mid-Cycle or EIE).

NOTE: *NWCCU will also require a review for change in modality for the first additional PEP offered by a new method of delivery to ensure the institution's ability to offer and implement the PEP meets NWCCU's Standards for Accreditation. Please contact your NWCCU Liaison for more information about this process.*

15. Establishing an international location

Any branch campus, additional location, or other instructional site located at an international location is considered a Major change that requires review and approval for creation of the first two locations.

A site visit may be required within six months after the establishment of new off-campus locations. Adding a new credential or degree level may require a post-implementation site visit.

16. 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) is considered a Major change. Bachelor of arts, Bachelor of Science, and Bachelor of Applied Science degrees are considered distinct credential levels from each other. Professional doctorates and research doctorates are considered distinct credential levels. The approval of a new degree level may require a follow-up evaluation with an onsite visit 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 may not contain an independent research component or require a dissertation and should not be confused with Ph.D. 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 for Accreditation and Eligibility Requirements, referenced in the [2023 Accreditation Handbook](#), as a framework for analysis. In light of the two 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. (Standards 1 and 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, laboratory, field, and other facilities to undertake research, 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 1)

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.

17. Change in mission and objectives

A change in mission is defined as a significant change to the objectives and operations of the institution, which could potentially have an impact on learning outcomes and achievements of existing students.

The institution must provide the rationale for the change in mission and how it will continue to satisfy the NWCCU Eligibility Requirements, Standards for Accreditation, and Policies.

A change from a college to a university is considered a change in mission and requires review by a peer panel and approval by the Executive Committee acting for the NWCCU Board of Commissioners.

18. Institutional organization change: legal status, ownership, or form of control

Organizational changes involving alteration in legal status, ownership, or form of control, and such changes affecting the institution in its entirety are Major changes. 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 direct or indirect possession 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 their NWCCU Staff Liaison 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 Peer Review Panel could require the institution to undergo a comprehensive review or be reviewed through the Eligibility Requirements of the application for accreditation process. For a comprehensive review, the institution must complete a self-evaluation report, host a visit by a Peer Evaluation Team that will complete and submit its peer-evaluation report and recommendations to the NWCCU Board of Commissioners. The Commissioners will review the reports and recommendations and take action on the institution's accreditation status.

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 confidentiality 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; and
- 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.

19. 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 location of another institution. This is also known as a Change in Ownership (CIO).

Steps to Undertake in Support of Merger of Two Institutions Per [FSA Guidance and Procedures](#):

1. The Acquired and Acquiring Institutions must inform NWCCU of intent to merge and arrange to meet with NWCCU President and Staff Liaison(s) to discuss path forward and processes. NWCCU and all parties ensure confidentiality until the process is completed.
2. Both institutions and their Boards must prepare an agreement on the merger reflecting all details of the transaction including timelines, whether there will be a teach-out for some or all students, whether graduating students will receive diploma from Acquiring or Acquired Institution, and potential financial implications to both institutions.

3. NWCCU staff may review and give feedback on the agreement. NWCCU staff may also share the types of details typically contained in agreements from other institutions that have merged successfully.
4. NWCCU staff will connect with the Federal Student Aid (FSA) office to alert them that the merger is contemplated and to determine whether there's anything NWCCU needs to focus on procedurally.
5. The institutions will ensure faculty, staff, and student engagement as needed and at appropriate time as per their internal governance policies.
6. The institutions must inform and receive approval from applicable state authorizing agencies.
7. Acquiring Institution must submit a Substantive Change Proposal to NWCCU.
 - a. NWCCU staff will convene panel for review of the Substantive Change Proposal for merger and may seek additional information from the institutions;
 - b. NWCCU Commissioners will review the proposal and other documentation, along with the findings and recommendations of the panel and take action;
 - c. Institutions will be informed of the action taken and be reminded that the approval pends USDE approval of the merger.
8. The Acquired and Acquiring Institutions should be in touch with the FSA office as early as possible.
9. **Step One:** The Acquired Institution must submit an application to USDE, per the steps provided in the [regulations](#), and submit all documents required by the regulations including the merger agreement, audited financial statements, and any additional documents required by USDE. The USDE will issue a Provisional Program Participation Agreement (PPPA) to the Acquired Institution, which expires at the end of the month following the change of ownership month.
 - a. Within 10 business days provide relevant documents
 - i. Signature page and application
 - ii. Current letter of accreditation, as of the day before the change (or most recent)
 - iii. Current state authorization
 - iv. Audited financial statements for two years for both Acquiring and Acquired Institutions (within nine months of the FY deadline)
 - b. Before the end of the month following the change of ownership month, submit:
 - i. Audited balance sheets
 - ii. Approval of the accreditor
 - iii. Approval of state regulator
10. The Change in Ownership (CIO) must receive the approval of NWCCU.
11. **Step Two:** Once the Acquired Institution completes the process and receives a PPPA, the Acquiring Institution must apply for realignment of the Acquired Institution whereby the latter institution relinquishes its OPEID and becomes an additional location of the Acquiring Institution. Once approved, the Acquired Institution ceases to be a separate institution. The two institutions need to decide whether to continue to use both FAFSA school codes or receive a

new one. The Acquiring Institution would receive an updated ECAR – Eligibility and Certification Approval Report, which reflects the new location of the Acquired Institution and programs.

12. Once USDE all approvals are received, NWCCU staff will submit a follow-up letter on the final approval and arrange for a site visit within six months.

Section Two: Substantive Change Review Procedures

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

Step 1: Determine Type of Change

Will this be a Portal Update, Portal Notification, Minor or Major Substantive Change? The Substantive Change Policy and its procedures describe in detail the categories and definitions of substantive changes requiring approval prior to implementation at the institution. 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 should contact their NWCCU Staff Liaison with questions or for any additional guidance.

Step 2: Develop the Proposal

If the substantive change requires a proposal, the Accreditation Liaison Officer (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.

All documents must be uploaded through the institutional online portal form (located on the NWCCU website's [Institutional Portal](#) page). Contact the NWCCU Staff Liaison if you need additional information.

For all Major Changes, the online proposal template will require institutional responses to each of the following categories of questions:

- a. Mission and Objectives:
 1. Clear statement of the nature and purposes of the change in the context of institutional mission and objectives.
- 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. Description of the educational offering(s) including credits to completion, courses by title and assigned academic credit granted;
 2. Description of 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; and
 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 [Lightcast](#) – formerly EMSI and the [BLS Occupational Outlook Handbook](#));
 2. Procedures used in arriving at the decision to change; and
 3. Timetable for implementation.
- e. Student Services:
 1. Capacity of student services to accommodate the change; and
 2. Implications of the change for services to the rest of the student body.
- f. Physical Facilities and Equipment:
 1. Provision for physical facilities and equipment.
- g. Library and Information Resources:
 1. Adequacy and availability of library and information resources.
- h. Faculty:
 1. Analysis of faculty and staff resources needed, including educational and professional credentials, experience, and qualifications of faculty members relative to their individual teaching assignments; and
 2. 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 be 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 and the document is materially ready for review and analysis by the NWCCU Staff Liaison or a peer review panel.

All proposals must also go through an institution's appropriate internal institutional approval processes. 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 ALO submits the Substantive Change proposal, along with [appropriate fees](#). 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 **three to six months** (even longer for very major changes such as transfer of ownership) *prior* to the anticipated implementation date to ensure adequate time to complete the review and approval process. An additional fee is required for expedited reviews.

Reviews are scheduled on a first-come, first-served basis. Receipt of the proposal and fee will reserve a place on the review calendar. **Proposal will NOT be processed during the months of April and October due to the intensity of time required to support teams and institutions for visits.** Proposals will not be processed until payment is received.

Review Time Frame

It is important to consider the complete time frame required 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 pre-accreditation granted to the institution. The time frame for approval may vary based on the complexity and type (Minor versus Major) of the proposed change. All Major changes requiring a Panel Review and those requiring site visits take longer to complete.

Preliminary Review by NWCCU Staff

Once the proposal is submitted, the NWCCU Staff Liaison will review the proposal and give the institution the opportunity to provide any missing information and to clarify any unclear aspects of the proposal. The NWCCU Staff Liaison will send the ALO an email with instructions for submitting any additional information. Upon receipt of the revisions, the proposal will be reviewed by the NWCCU Staff Liaison or forwarded to the Peer Panel for review and their recommendation to the Executive Committee, as appropriate.

Step 4: The Review

All substantive change proposals are reviewed by an NWCCU Staff Liaison or by a three-person Peer Review Panel selected from institutional representatives with appropriate expertise.

Where a Peer Review Panel is required, the Panel is comprised of peers who are chosen based on their experience in higher education and in the associated substantive change matter. The Peer Review Panel reviews and assesses each proposal and uses these preliminary evaluations to guide the discussion and make recommendations to the Executive Committee, which will render a decision on the proposal acting for the NWCCU Board of Commissioners. In some cases, a Peer Review Panel may request additional materials from the institution.

Step 5: Receive Notification from NWCCU

The institution will be notified by email when Final Approval has been granted or denied.

- Recommend approval with no conditions;
- Recommend approval with conditions;
- Recommend deferred action pending receipt of additional information; or
- Recommend denial.

A Review Panel may also recommend a site visit, if applicable.

Revising a Proposal or Providing Additional Information

The Peer Review Panel may determine that a proposed change is not sufficiently well developed or lacks adequate detail to be forwarded to the Executive Committee for approval, in which case the proposal will be returned to the institution for further development. The institution will receive from NWCCU, on behalf of the Peer Review Panel, an action letter that specifies 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 institution has three months to resubmit the revised proposal, which needs only to address the specific issues cited by the Peer Review Panel; after three months, a new proposal must be submitted for consideration.

An appropriate substantive change fee is due prior to consideration of the resubmitted proposal. Please consult the current [Dues and Fees](#) schedule.

Typically, a revised proposal is reviewed by the same Review Panel as originally assigned. However, for a resubmission, the NWCCU Staff Liaison may request another review by a different Peer Review Panel if they deem 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 Peer Review Panel, it will be forwarded to the Executive Committee for consideration (or a site visit will be scheduled, if warranted).

Executive Committee Decision

Major substantive Changes are reviewed by a Peer Review Panel who then makes recommendations to the Executive Committee who will consider the proposal and who will then make the final determination. The Executive Committee meets approximately every six weeks, and may take the following actions:

- Approve the proposal without conditions;
- Approve the proposal with conditions;

- Deny approval of the proposal;
- Defer action pending the receipt of additional information; or
- Defer action and refer the proposal to the Commission at its next regularly scheduled meeting.

Request for Reconsideration of Executive Committee Action

If the proposal is denied by the Executive Committee, the institution may request in writing consideration by the Commission within 30 days of the date of notification of the Executive Committee's denial of the change.

Step 6: When Required, Host a Site Visit

If the Peer Review Panel recommends proceeding to a required site visit prior to a decision on the proposal, NWCCU staff will work with the ALO to determine a date for the visit. The visit will be conducted by one or two members of the Peer 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 the Peer Review Panel may include meetings with faculty members, administrators, students, and others on campus. The ALO will work with the Peer Review Panel to finalize the agenda and arrange for the Peer Review Panel's accommodations.

The Peer Review Panel 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 Peer Review Panel 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

Peer Review Panel travel expenses and the applicable site visit fee will be charged to the institution. Please refer to the [NWCCU website](#) for the current fee schedule.

Step 7: Receive Final Approval

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

Substantive Changes

Minor substantive changes are reviewed and approved by the NWCCU Staff Liaison. Major substantive changes are reviewed by a Peer Review Panel, which makes a recommendation to the Executive Committee for the final decision, acting for the NWCCU Board of Commissioners. An institution is notified in writing of the results of all Minor and Major substantive changes.

Organizational Changes at the Institutional Level

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

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 Approved by the Executive Committee, the institution will receive an action letter specifying the reasons for the decision, citing the relevant Eligibility Requirements or Standards for Accreditation, and, if appropriate, describe 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 placed on the agenda of the next regularly scheduled meeting and is considered by the full Commission, one of the following actions may be taken:

- Approve the proposal without conditions;
- Approve 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 and make a recommendation to the Executive Committee.

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 only after 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 USDE 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, such as:

- Adding a branch campus;
- Acquisitions and mergers; and
- Change in mission and objectives.

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 Peer Review Panel, and to determine the overall impact of the change on the institution.

One or two members of the Peer Review Panel may conduct the visit, which may require one or more days.

Substantive change site visits are typically narrow in scope and cover issues determined in advance and include review of the original substantive change proposal. During a visit, Peer 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/or within 30 to 60 days following the Panel Review. In some cases, the visit may include branch campuses that provide administrative support or oversight to a site.

Following the visit, the Peer Review Panel will write a brief report, which will be forwarded to the institution for correction of errors of fact only. 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 the Executive Committee who will make the final determination.

Site visits may be waived at the discretion of the NWCCU Staff Liaison or the Executive Committee.

Expenses

[Evaluator expenses and appropriate site visit fees](#) will be charged to the institution.

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:

- Adding a degree program at a new credential level; and/or,
- Extenuating circumstances identified by the Peer Review Panel or NWCCU Staff Liaison.

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. The NWCCU Staff Liaison will then contact the institution to plan and schedule the required visit.

Following the visit, the Peer Review Panel will write a brief report that will be reviewed by the NWCCU Staff Liaison 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 their consideration.

Expenses

[Evaluator expenses and appropriate site visit fee will](#) be charged to the institution.

Post-implementation Site Visits

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

- Adding a degree program at a new credential level.
- Off-campus sites (within six months of establishment) if the institution:
 - Has two or fewer additional locations;
 - Has not demonstrated a proven record of effective educational oversight of additional locations; or
 - Has been placed on sanction.
- Prison Education Programs
 - Has two or fewer additional locations
- 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; or
 - 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 Peer Review Panel) 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 Peer Review Panel or NWCCU Staff Liaison 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 NWCCU action letter of approval 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. The NWCCU Staff Liaison will then contact the ALO to plan and schedule the visit.

Following the visit, the Peer Review Panel will write a brief report that will be reviewed by the NWCCU Staff Liaison 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 their consideration.

Expenses

[Evaluator expenses and appropriate site visit](#) fee will be charged to the institution.

Section Four: Appendices

Appendix 1: NWCCU Resources Related to Substantive Change

Policies

- [Accreditation Criteria](#)
- [Procedures to Close a Program, Branch Campus, or Institution](#)
- [Contracts for Education-Related Services](#)
- [Credit Hour Policy](#)
- [Distance Education Policy](#)
- [Direct Assessment and Competency-Based Education Policy](#)
- [Public Disclosures Required by an Institution](#)
- [Significant Growth Policy](#)
- [Substantive Change Policy](#)
- [Transfer and Award of Academic Credit Policy](#)

Other Resources

- [Dues and Fees Schedule](#)
- [2023 Handbook of Accreditation](#)

Appendix 2: Frequently Asked Questions and Common Issues in Substantive Change Proposals

FAQs

Do all changes need Approval?

Yes. While all changes require approval prior to implementation, there are different levels of review, and different timelines associated with each. The first category are Portal Updates and Portal Notifications. These can be done quickly and easily. The NWCCU Staff Liaison is alerted to this change, and they will review to make sure all evidence is provided and there are no questions. The second category of review is the Minor Change category. These are reviewed and approved by the NWCCU Staff Liaison, and provided materially complete submission of materials these reviews are completed in 30-60 days. The third category is the Major Change category. These types of changes require review by a panel and approval by the Executive Committee. Depending on the complexity of the substantive change and provided materially complete submission of materials, these reviews are completed in three to six months.

How do I determine which category of substantive change?

This manual provides an organized chart that categorizes the types of substantive changes and outlines the policy and procedures that govern substantive change. If you are uncertain whether a proposed change requires prior approval, contact the NWCCU Staff Liaison 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 three months prior to the planned implementation date of the change to provide adequate time for review and approval. Major changes must be submitted a minimum of six months in advance of planned implementation. Institutions are encouraged to plan accordingly because changes cannot be implemented without NWCCU approval and could potentially result in adverse action.

Who reviews my proposal for a substantive change?

Proposals are reviewed by the NWCCU Staff Liaison for Minor changes, and in case of Major changes by members of Peer Review Panel who then make a recommendation to the Executive Committee.

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

In some cases, the Commission may require a comprehensive institutional review and/or financial resources 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. For a comprehensive review, the institution must complete a self-evaluation report, host a visit by a Peer Evaluation Team that will complete and submit its peer-evaluation report and recommendations to the NWCCU Board of Commissioners. The Commissioners will review the reports and recommendations and take action on the institution's accreditation status.

Changes that may trigger a comprehensive review include, but are not limited to:

- Change in the mission or objectives of the institution;

- Significant growth in new educational programs in any modality;
- Multiple extensive changes to existing educational programs;
- Addition of new colleges or programs within an institution;
- Significant growth in student enrollment;
- Significant growth in campuses or off-campus locations for educational program delivery; or
- A change of ownership or form of control which may or may not result in a change of mission.

Common Issues

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

Institutional Accrediting History (Standard 1 and 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 1.B.4 and 2.E.2)

- 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 1.B.1, 2.D.1, and 1.D.1)

- 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 1.B.3 and 2.A.2)

- 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?

Contracts for Education-Related Services (see [Contracts for Education-Related Services Policy](#))

- Is the contract for non-education-related services? If yes, no substantive change submission required.

Examples:

A contract to provide housing assistance to students studying abroad would not require review.

A contract with a foreign university to teach your students while living abroad would require review.

- Is the institution's contract or Memorandum of Understanding (MOU) attached identifying a chosen partner for educational delivery of content and that partner's responsibilities?
We want the contracts for education-related services attached to the substantive change proposal.
- Is the contract with another accredited organization?
The accreditation status of the organization you are contracting with for education-related services affects the percentage of the academic program for which review and prior approval is required:
 - If the contract for education-related services is with an accredited organization then review and prior approval is required if the other organization is going to offer 50% or more of one or more academic programs.
 - If the contract for education-related services is with a non-accredited organization then review and prior approval is always required.
- What percentage of the institution's programs is being contracted to the outside organization?
 - If the contract for education-related services is with a non-accredited organization, the percentage cannot be more than 50%; the contract must be submitted to review and requires prior approval.
 - If the contract for education-related services is with an accredited organization, the contract must be submitted to review and prior approval only if the other organization will offer 50% or more of one or more academic programs.
- Does the contract provide for the oversight of the curricula by the institution's faculty?
There are two ways to provide oversight of the curricula by your institution's faculty:
 - Your faculty can be involved in the design, review, and continuing updates of the curriculum.
 - Your faculty can be involved in the periodic review of the contracted program to determine if the contracted program is still meeting the needs and requirements of your institution. If it is not, the contract with the other institution should be terminated.
- Does the contract provide for compliance with NWCCU standards of accreditation?
Essentially, NWCCU wants you to ensure that the contracted education-related services are of sufficient quality and rigor that they would meet NWCCU Policies and Standards if they were offered by your institution. NWCCU's Policy on Contracts for Education-Related Services requires each contract to include the following statement:

If any provision of this Agreement is determined by NWCCU to place the institution's accreditation in jeopardy, such provision will be reviewed and restated to comply with the institution's accreditation

Direct Assessment and Competency-Based Education (see [Direct Assessment and Competency-Based Education Policy](#))

- Is the delivery methodology one of competency-based education (CBE) or direct assessment only?

Competency-Based Education

Competency-Based Education (CBE) is a method of assessing student academic progress in which a student must demonstrate competence on the required elements of earlier program units in order to move on to more advanced program elements. In some cases, competency-based education operates without connection to a calendar (students move forward as they are able, not when the semester ends), and without assigning grades. However, CBE can also be used with a calendar system and with a grading system.

If the academic program is to be eligible for Title IV funding, there needs to be a mapping of the program requirements to credit hours.

Some important questions to consider are:

- If using CBE as the delivery method, are the competencies or learning modules related to specific credit hours?
- Is there another organization involved in the direct assessment of competencies?
- Is there evidence of regular and substantive interactions between students and faculty?

The Department of Education has introduced the concept of regular and substantive interactions between students and faculty to differentiate distance education from correspondence education. It is not directly related to CBE, but this question will be important when CBE is used with distance delivery.

Direct Assessment

Direct assessment is a method of assessing student academic progress in which a student must demonstrate proficiency with required elements of an academic program to the satisfaction of a practitioner or other expert in the field. Direct assessment is common in the trades (e.g., welding) and healthcare (e.g., patient care). Direct assessment may be used alone, or as part of a larger assessment process.

Some important questions to consider are:

- Is direct assessment the only assessment used to monitor student progress, or is it being used in combination with another assessment process (such as traditional grading methods)?
- Is there another organization involved in the direct assessment of competencies (e.g., flight school, or hospital staff)?
- Is there evidence of regular and substantive interactions between students and faculty?

The Department of Education has introduced the concept of regular and substantive interactions between students and faculty to differentiate distance education from correspondence education. It is not directly related to direct assessment, but this question will be important when direct assessment is used with distance delivery.

Curriculum (Standard 2.D.1 and 2.G.2)

- Does the list of courses 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 1.C.2 and 1.C.3)

- Do the course learning outcomes link to program learning outcomes?
- Are 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 (see [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 for alternative deliveries?

Educational Effectiveness (Standard 1.C)

- 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 quantitative and qualitative, 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?

Faculty (Standard 2.F.2 and 2.G.2)

- Are the number of full time and part time 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? Or, is a brief description of faculty credentials included?

Library/Information Resources (Standard 1.C.6 and 2.H.1)

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

Finances (Standard 2.E)

- 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 (Policy: [Procedures to Close a Program, Branch Campus or Institution](#))

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

Institutional Learning Outcomes (General Education) (Standard 1.C.6)

- Are the institutional learning outcomes or general education learning outcomes appropriate to the degree level?
- Are the courses containing institutional learning outcomes or general education learning outcomes clearly labeled as such?

Graduate Faculty (Standard 1.C.5 and 2.F.1-3)

- 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 1.C.9)

- 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?