

NWCCU POLICIES | SUBSTANTIVE CHANGE POLICY

Pursuant to Federal Regulations 34 CFR 602.22, the Northwest Commission on Colleges and Universities ([NWCCU](#) or Commission) monitors proposed high-impact, high-risk changes by an institution to ensure that substantive changes do not adversely affect its capacity to continue to meet the Commission's Standards for Accreditation, Eligibility Requirements, or Policies.

NWCCU requires the institution to obtain approval of a substantive change before the Commission includes the change in the scope of the Accreditation or Candidacy (pre-accreditation) granted to the institution. Therefore, institutions must submit a request for review and approval prior to the following changes:

For substantive changes under the **Minor Substantive Change** category, NWCCU Senior Staff is authorized to review for approval or disapproval. Substantive Changes are categorized as Minor if they are likely to have minimal impact on institutional resources, capacity, or ability to successfully serve students to program completion, and Federal Regulations (34 CFR 602.22) has authorized staff review and decision.

Minor Substantive Change Senior Staff Review	Change Type	Review Level	USDE Reference
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 approved previously	Minor	Senior Staff Review	602.22(a)(1)(ii)(C)
Changing institutional prior learning procedures to accommodate a customized pathway or modifications of programmatic content to support learning outcomes	Minor	Senior Staff Review	602.22(b)(3)(i-ii)
Initiating distance education delivery of any portion of an academic program, for institutions not currently authorized to deliver distance education	Minor	Senior Staff Review	602.22(a)(1)(ii)(C)
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	Senior Staff Review	602.22(a)(1)(ii)(F)
Changing an institutional annual calendar system including semester, trimester, quarter, block, or competency-based units	Minor	Senior Staff Review	602.22(a)(1)(ii)(E)

Minor Substantive Change Senior Staff Review	Change Type	Review Level	USDE Reference
Entering into a contractual agreement for education-related services under 34 CFR 668.5 under which an institution or organization that is 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.	Minor	Senior Staff Review	602.22(a)(1)(ii)(J)
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	Senior Staff Review	602.22(a)(1)(ii)(C)
Changing an existing program from clock to credit hours (or vice versa)	Minor	Senior Staff Review	602.22(a)(1)(ii)(E)
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	Senior Staff Review	602.22(a)(1)(ii)(C)
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	Senior Staff Review	602.22(a)(1)(ii)(H)

Note: Please contact relevant NWCCU Staff Liaison for questions regarding determination of Minor or Major Substantive Change or for general questions related to program changes or advertising the same.

Timetable for Minor Substantive Change Requests

Timeline	Party Responsible	Detail
Within sixty (60) days of receipt of a completed request	NWCCU Senior Staff	Approve or decline Minor Substantive Change requests

Substantive changes are categorized as Major if they are likely to be of a magnitude that could alter an institution's mission, objectives, institutional planning, and resource allocation. 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 being proposed. The peer review panel undertakes analysis of the proposed programmatic change, resources, relevant state and campus level approvals, if needed, and capacity to implement the proposed change. The peer review panel will complete its review and make a recommendation to the Executive Committee of the NWCCU Board of Commissioners that will make the final determination for approval or disapproval.

Major Substantive Change Panel Review	Change Type	Review Level	USDE Reference
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)
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)
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) <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)
Establishing a Prison Education Program. (First two locations only) <i>(Post-implementation visit <u>is required</u> within one year of implementation.)</i>	Major	Panel Review	602.22(a)(1)(ii)(I) 602.22(f) 668.237(b)
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)
Adding the first academic program at a degree or credential level not previously included in the institution's accreditation or 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>	Major for first program	Panel Review	602.22(a)(1)(ii)(D)
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)
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)
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)

The date of the Commission’s approval letter serves as the effective date on which the change is included in the institution’s accreditation, only after which the institution may advertise the change and recruit students. Effective dates of changes are not retroactive.

Each institution is responsible for developing internal procedures to ensure that it is in compliance with the Commission’s Substantive Change policies and procedures. If NWCCU determines that an institution has initiated a substantive change without approval, the Commission may issue an order for the institution to Show Cause as to why its Accreditation or Candidate status should not be terminated.

A comprehensive explanation of NWCCU’s policies and procedures regarding Substantive Change may be found in the [Substantive Change Manual](#), which is available on the NWCCU website.

Timetable for Major Substantive Change Requests

Timeline	Party Responsible	Detail
Within sixty (60) days of receipt of a completed request	NWCCU Senior Staff	Constitutes a three-person review panel for Major Substantive Change requests
Within thirty (30) days of review panel appointment	Review Panel	Requests additional information from institution as needed to make a recommendation on a Major Substantive Change request
Within sixty (60) days of receiving requested additional information	Review Panel	Makes a recommendation to the Commission for a decision on a Major Substantive Change request
Within sixty (60) days of Review Panel recommendation	Commission or Executive Committee	Makes a decision on a Major Substantive Change request

Adopted 1972, Revised 1978, 1994, 1996, 2001, 2002, 2007, 2013, 2016, 2018, 2021, 2023, January 2024