

UNC HLC Academic Program Substantive Change Guidelines

February 2024

In order to meet UNC's continuing obligations for accreditation by the Higher Learning Commission (HLC), UNC will adhere to all substantive change standards, requirements, policies, and procedures maintained by the HLC. The federal government requires the HLC to monitor its member institutions' substantive change activity, and the HLC has established policies and procedures for institutional compliance. Failure to maintain such compliance can result in significant negative impact from the HLC and the US Department of Education, including loss of eligibility for Title IV funding, federal grants and contracts, or fines imposed by the federal government.

Substantive change is defined as significant modification or expansion of the nature and scope of an accredited institution. Specifically, as indicated by the HLC, substantive change includes the following:

1. Offering new degree or certificate programs;
2. Changes to existing programs involving clock or credit hours, length of term, program content, method of delivery, customized pathways, or suspension/closure of an existing program;
3. Off-campus activities involving opening, closing, relocating, or reclassifying a branch campus or additional location;
4. Initiating or expanding courses and/or programs offered through distance education or correspondence education;
5. Initiating, modifying, or renewing contractual arrangements involving outsourcing some portion of an educational program to an unaccredited institution, corporation, or other entity;
6. Offering academic programs through competency-based education (CBE), including direct assessment, hybrid, or credit-based CBE;
7. Offering a new Pell-eligible prison education program or changing the modality of an approved program;
8. Changing the institution's mission, educational objectives, or the character or nature of the student body; and
9. Undergoing a change of control, structure, or organization.

The Substantive Change Committee is charged by the Provost and Executive Vice President for Academic Affairs with oversight of UNC's HLC Substantive Change procedures related to academic programs and additional locations (items 1-7 above), with membership as follows: HLC Accreditation Liaison Officer (chair), Executive Director of Extended Campus, Vice Provost for Academic Resources and Planning, Associate Provost and Assistant Vice President for Undergraduate Studies, and Associate Vice President of Research and Dean of the Graduate School. Substantive changes described in items 8-9 are at the President's prerogative.

Purpose of Guidelines

Federal regulations adopted on July 1, 2020, clarified the requirements for accrediting bodies and their member institutions for changes related to the development, revision, delivery modality, location, and suspension or closure of academic programs. These guidelines provide information to faculty, academic unit leaders, Deans, and other stakeholders about the requirements and processes for ensuring UNC's ongoing compliance with HLC substantive change policies.

Authority

HLC Policy INST.F.20.040; 34 CFR § 602.22

HLC Requirements

The HLC, in accordance with federal regulations, is responsible for monitoring the substantive change activities of member institutions. It does so primarily by distinguishing changes that require notification from those requiring prior approval.

Changes Requiring Notification

Historically, most substantive changes occurring at UNC have been those requiring notification rather than prior approval. Changes requiring notification are submitted to the HLC by the HLC Accreditation Liaison Officer and documented in UNC’s Curriculum Tracker where applicable. Table 1 describes the substantive changes that require notification to the HLC.

Table 1: Changes Requiring Notification

Type of Change	Details	UNC Procedure
New Degree Programs	New degree programs that are in the same CIP family as one or more existing programs, that do not require a substantial investment of resources, and/or are at a degree level currently offered at UNC.	Academic Program Proposal process
New Certificate embedded in existing degree program	More than 50% of courses are derived from courses in an existing program.	Academic Program Proposal process
Additional Locations	Suspension of all activity at the site for more than one semester.	Additional Location Procedure
Existing Programs	Increasing or decreasing the number of clock or credit hours required for completion of a certificate program by 25-50%.	Curriculum process
	Aggregate change of 25% or more to the content of a program since its most recent HLC accreditation review.	
	Changing program’s method of delivery to distance education.	
Contractual Arrangements	Less than 25% of any academic program is outsourced to another party	Contractual Arrangement Procedure

Changes Requiring Prior Approval

Changes requiring prior approval include a review process conducted by the HLC. The HLC assesses UNC a charge for each substantive change review, with the cost increasing if a campus visit is required for approval. Table 2 describes the types of changes requiring prior approval and the process UNC uses for internal review and approval before submitting an application to the HLC.

Table 2: Changes Requiring Prior Approval

Type of Change	Details*	Review Timeline**	UNC Procedure
New Degree Programs	First three programs at a new degree or credential level	8 months	New academic program proposal process
	Significant departure from programs previously included in the institution's accreditation	3-8 months depending on type of review required (desk review, panel review, change visit)	
	Outside the institution's existing HLC stipulations		
	Requires allocation of substantial financial investment or resources		
New Certificate Programs	50% or more of program's courses were developed specifically for the new program and not derived from courses in an existing degree program	3 months	New academic program proposal process
Additional Locations	Opening a new location	3-5 months	Changes to additional location procedure
	Changing the geographic location of a previously approved location	3-5 months	
	Closing a location that offers a full degree or certificate program	3 months	
Existing Programs	Converting 10% or more of the clock hours awarded for completion of a program to credit hours	3 months	Curriculum process
	Converting 10% or more of the credit hours awarded for completion of a program to clock hours	3 months	
	Increasing or decreasing the number of clock or credit hours required for completion of a degree program by 25% or more	3 months	
	Increasing or decreasing the number of clock or credit hours required for completion of a certificate program by more than 50%	3 months	
	Changing a program's method of delivery to direct assessment or hybrid-competency-based education	5 months	
New Competency-Based	Starting a direct assessment or hybrid CBE program	Minimum 5 months	Curriculum process

Type of Change	Details*	Review Timeline**	UNC Procedure
Education Program			
Contractual Arrangement	25% or more of any academic program is outsourced to the other party	90 days	Contractual Arrangement procedure

*See Appendix B for examples of changes requiring prior approval.

**Reflects the estimated time from the HLC application submission date to decision date.

Changes Requiring HLC Consultation

A small number of substantive changes require consultation with the HLC to determine whether prior approval or notification is required. Table 3 describes these changes and UNC's review process.

Table 3: Other Substantive Changes

Change	Details	UNC Procedure
Cancellation or Suspension of any academic program (closure or program pause)	Program suspension (pause) of more than one academic term or program cancellation (closure) may require prior approval depending on the unique circumstances associated with the specific change.	Curriculum process
Provisional Plan and Teach Out Procedure	Closing or relocating a program and/or additional location may require the university to submit a teach out plan.	Curriculum process

Responsibilities

Maintaining compliance with HLC Substantive Change Policies is a shared responsibility. To ensure that UNC continues to meet its accreditation obligations, the following individuals and groups have distinct roles and responsibilities.

1. UNC's HLC Accreditation Liaison Officer must:
 - a. Monitor HLC substantive change policies for modifications that may require revision to UNC's substantive change guidelines and procedures.
 - b. Monitor UNC's compliance with HLC substantive change policies and processes.
 - c. Provide guidance to individuals and offices proposing a substantive change.
 - d. Oversee the process of preparing and submitting appropriate notification to the HLC or applying for prior approval as required by HLC policies.
 - e. Submit and maintain documentation of UNC notifications, applications, and HLC actions related to substantive change.
 - f. Chair the university's Substantive Change Committee.
2. UNC's Substantive Change Committee must:
 - a. Review and make recommendations for changes to UNC's academic program substantive change guidelines and procedures.
 - b. Review and approve substantive change requests associated with off-campus activities.
 - c. Review and approve substantive change requests associated with contractual arrangements.
3. Deans and Academic Unit Leaders must:
 - a. Be aware of UNC's substantive change guidelines and procedures.

- b. Recognize potential substantive changes occurring within their college and academic unit(s).
- c. Ensure that substantive changes are reviewed and approved through the appropriate university procedure (e.g., curriculum, contracts, additional locations, etc.).
- d. For changes requiring prior approval, prepare the HLC substantive change application document and supporting materials.

UNC Procedures for HLC Academic Program Substantive Change

1. Substantive changes involving the creation, modification, suspension, or closure of academic degree programs and certificates are managed through UNC's Academic Proposal Process for new degrees and certificates and the Curriculum Process for changes, suspension, or closure of programs. Information about both of these processes can be found on the [UNC website](#). Questions about these processes should be directed to the Associate Provost and Assistant Vice President for Undergraduate Studies.
2. Decisions for adding, moving, or closing locations that deliver one or more academic program(s) require prior approval from the HLC. Such decisions must be carefully considered to determine alignment with UNC's strategic priorities, resource commitment, impact on faculty workload, demand, and financial sustainability. The Substantive Change Committee is responsible for reviewing and approving all changes to UNC's additional locations that fall under the HLC Substantive Change Policy. UNC's Additional Location Procedures are available on the [UNC website](#).
3. Decisions regarding the outsourcing of any portion of a UNC educational program are reviewed by the Substantive Change Committee prior to initiating a contract through UNC's Contracting Policies and Procedures. UNC's HLC Contractual Arrangement Procedure is available on the [UNC website](#).

Appendix A: Substantive Change Definitions

Academic Program (also referred to as Educational Program or Academic Offerings) – A legally authorized postsecondary program of organized instruction or study that:

- Leads to an academic, professional, or vocational degree, or certificate, or other recognized educational credential, or is a comprehensive transition and postsecondary program, as described in 34 CFR part 668, subpart O; and
- May, in lieu of credit hours or clock hours as a measure of student learning, utilize direct assessment of student learning, or recognize the direct assessment of student learning by others, if such assessment is consistent with the accreditation of the institution or program utilizing the results of the assessment and with the provisions of 34 CFR § 668.10.

Accreditation Liaison Officer – the person designated by the university to serve as the primary contact between the institution and the HLC.

Additional Location – A facility that is geographically apart from the main campus, where instruction takes place, and it is possible for students to do one or more of the following:

- Complete 50% or more of the courses in educational programs leading to a degree, certificate or other recognized educational credential.
- Complete 50% or more of a degree completion program (even if the degree completion program provides less than 50% of the courses leading to the degree).

Changes to Existing Programs – changes related to clock hours, credit hours, program content, customized pathways, method of delivery, length of term affecting allocation of credit, or the cancellation or suspension of a program.

Clock and Credit Hours – Clock hours refers to the actual number of hours per week a student spends attending class or other instructional activities that count toward completing a program of study. Credit hours reflect each course's workload including in class and out of class work needed to successfully complete a program of study.

Competency Based Education – an outcomes-based program in which student progression is based on demonstrating attainment of specified competencies. Competency Based Education can be structured as a course/credit-based approach or a direct assessment approach. The former is structured similar to a traditional academic term, and the latter is not based on academic terms completed or credits earned.

Contractual Arrangement – An arrangement in which the institution outsources some portion of its educational programs — that is, degrees or certificates offered for academic credit, including instruction, oversight of the curriculum, assurance of the consistency in the level and quality of instruction and in expectations of student performance and/or the establishment of the academic qualifications for instructional personnel — to:

- An unaccredited institution.
- An institution that is not accredited by an accreditor recognized by the U.S. Department of Education.
- A corporation or other entity.

Direct Assessment – a term used by the U.S. Department of Education to describe programs in which students progress at their own pace and advance based on attainment of specified competencies at a high level of performance.

Distance Education Program – An academic program offered in whole or in part through distance education, regardless of whether a face-to-face, on-ground, or residential option is also available.

Program Content – changes to a program's curriculum (measured by clock or credit hours), learning objectives, competencies, or required clinical experiences. This would include changes in the general education courses required for program completion and not merely the courses within the discipline, program or major.

Substantive Change – Significant high impact, high risk modifications to an institution or its programs including modifications described in HLC Policy INST.F.20.040 and 34 CFR § 602.22 related to new academic programs; changes to existing programs; competency-based education; contractual arrangements; control, structure, or organization; distance delivery; mission or student body; and off-campus activities.

Appendix B: Examples of Changes Requiring Prior Approval

Type of Change	Type of Change	UNC-Specific Examples
New Academic Degree Program	First three programs at a new degree or credential level (currently approved for Bachelor's, Master's, Specialist, and Doctoral)	Adding an Associate of Applied Science degree
	New degree program that is significant departure from programs previously included in UNC's accreditation	Creating a new degree program in an area such as Crop Production, Architecture, Law, or Theology (no current programs in the same CIP code)
	New degree program outside UNC's existing HLC stipulations (currently approved for distance education courses and programs and correspondence courses)	Offering a new degree program via correspondence education
	New degree program requiring substantial financial investment or resources	Launching a new degree in veterinary sciences
New Certificate Programs	50% or more of program's courses were developed specifically for the new program and not derived from courses in an existing degree program	Creating a new 15-credit graduate certificate in Urban Planning with 3 of the 5 courses developed for the new certificate (60%)
Additional Locations	Opening a new location	Setting up a new face-to-face educator licensure degree program onsite at a regional school district
	Changing the geographic location of a previously approved location	Moving to a new location in the same city for a better rental agreement
	Closing a location that offers a full degree or certificate program	Closing an onsite certificate program with a regional business because of no demand
Existing Programs	Converting 10% or more of the clock hours awarded for completion of a program to credit hours.	N/A – UNC does not currently offer any programs based on clock hours
	Converting 10% or more of the credit hours awarded for completion of a program to clock hours.	N/A – UNC does not currently offer any programs based on clock hours
	Increasing or decreasing the number of clock or credit hours required for completion of a degree program by 25% or more	Increasing a 30 credit master's program to 39 credits to meet new professional accreditation requirements (30% increase)
	Increasing or decreasing the number of clock or credit hours required for completion of a certificate program by more than 50%	Reducing a 24 credit graduate certificate program to 12 credits to make it more competitive with similar programs (50% decrease)

	Changing a program's method of delivery to direct assessment or hybrid-competency-based education	N/A – UNC does not currently offer direct assessment or competency-based education
New Competency-Based Education Program	Starting a direct assessment or hybrid CBE program	N/A – UNC does not currently offer direct assessment or competency-based education
Contractual Arrangement	25% or more of any academic program is outsourced to the other party	Partnering with an online program management (OPM) company to teach general education courses for UNC online programs with courses transcribed as UNC courses (31 of 120) credits = 26% of degree requirements
Cancellation of any academic program	Closing or relocating a program before all currently enrolled students are able to complete will require a teach-out plan and prior approval from the HLC.	Relocating a program offered at Denver-Lowry to the Greeley campus because of insufficient instructors available to teach at the Denver site