



## Substantive Change Application

### Distance Delivery

## Background Information on Distance Delivery<sup>1</sup>

Higher Learning Commission (HLC) policies outline when institutions need to notify the Commission about distance-delivered instruction and when they need to seek approval. (See policy 3.2(a) and the information below.)

This document defines the characteristics of distance delivery, specifies when institutions must notify the Commission or seek approval for distance delivery, and provides the form for seeking approval.

### Commission Definitions for Distance-Delivered Courses and Programs

The Higher Learning Commission uses the following definitions for the purpose of applying its policy on distance delivery to its accredited and candidate institutions:

- Distance-delivered **courses** are those in which all or the vast majority (typically 75% or more) of the instruction and interaction occurs via electronic communication, correspondence, or equivalent mechanisms, with the faculty and students physically separated from each other.
- Distance-delivered **programs** are those certificate or degree programs in which 50% or more of the required courses may be taken as distance-delivered **courses**.

### Reporting and Seeking Approval for Distance-Delivered Offerings

The chart below identifies the Percentage Brackets for determining the scope of distance delivery by an institution. The Commission determines the appropriate Percentage Bracket for each institution. Such determination is based on information provided by the institution in its Annual Institutional Data Update to the Commission or when it seeks and receives approval of a proposed change. Programs new to the institution may require approval by the Commission following the Commission's policy on Institutional Change prior to their being offered to students and regardless of the method of delivery. See the separate Program Change Application for additional information or discuss the proposed change with your HLC liaison.

Percentage Bracket	Percentage of Distance-Delivered Offerings (calculations are based on degree programs, not certificates)
3	Up to 100% of total degree programs
2	Up to 20% of total degree programs
1	Initiation of distance-delivered offerings up to 5% of total degree or certificate programs
Pre-initiation	No degree or certificate programs. Institution has been approved to offer distance delivered courses.
None	No courses or certificate or degree programs.

Higher Learning Commission policy requires an institution to seek the Commission's prior approval if the institution plans to **initiate** or **expand** its distance-delivered offerings as described below. When initiation or expansion is anticipated, an institution must submit a substantive change request using the forms contained in this document.

**Initiation or pre-initiation** occurs and a review is required when the institution:

- plans to initiate its first distance education course or certificate;
- plans to initiate its first distance education degree program, even when it has been approved to offer distance education certificates or correspondence education degree programs or certificates;
- plans to initiate its first correspondence education degree program, even when it has been approved to offer correspondence education certificates or distance education degree programs or certificates;
- has initiated four distance education certificates and plans to initiate a fifth, unless the institution has already been reviewed and approved to offer one or more distance education degree programs.

**Expansion** occurs and a review is required when the institution:

- plans to increase its current activity in distance education degree programs or its current activity in correspondence education degree programs to a higher Percentage Bracket.

In addition, the Commission may require a substantive change evaluation if the institution:

- has never had a focused review of distance or correspondence education under the previous policy regarding distance education and is now offering one or more programs; or
- has a significant annual increase in enrollment.

In addition to reviewing distance-delivered courses and programs through its substantive change processes, the Commission evaluates delivery whenever it comprehensively reviews an institution. In these comprehensive reviews, the Commission examines the institution's capacity to provide education to its students and the quality of its performance in doing so, whether via distance delivery or traditional face-to-face modes. Comprehensive reviews examine curriculum, staffing, support services, access to appropriate laboratory and library resources, and all other facets of quality higher education.

## Questions

For general questions on approval of distance-delivered courses or programs, send an e-mail to [changerequests@hlcommission.org](mailto:changerequests@hlcommission.org) or call 800-621-7440 x137. For institution-specific questions, contact the Commission staff liaison assigned to the institution by calling 800-621-7440 and asking to be transferred to the liaison.

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<sup>1</sup> Wherever distance delivery is mentioned throughout this document it means distance or correspondence delivery. The following are the Federal definitions (2009) of distance and correspondence education:

Correspondence education means:

- (1) Education provided through one or more courses by an institution under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor.
- (2) Interaction between the instructor and the student is limited, is not regular and substantive, and is primarily initiated by the student.
- (3) Correspondence courses are typically self-paced.
- (4) Correspondence education is not distance education.

Distance Education means education that uses one or more of the technologies listed in paragraphs (1) through (4) to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously. The technologies may include:

- (1) The internet;
- (2) One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;

- (3) Audio conferencing; or
- (4) Video cassettes, DVDs, and CD-ROMs, if the cassettes, DVDs, or CD-ROMs are used in a course in conjunction with any of the technologies listed in paragraphs (1) through (3).

**Substantive Change Application, Part 1: General Questions**

**Distance Delivery**

*Note: Wherever distance delivery is mentioned it means distance or correspondence delivery.*

**Institution:** \_\_\_\_\_ **City, State:** \_\_\_\_\_

**Name of person completing this application:** \_\_\_\_\_ **Date Submitted:** MM/DD/YYYY

**Title:** \_\_\_\_\_ **Phone:** \_\_\_\_\_ **Email:** \_\_\_\_\_

The questions are designed to elicit brief, succinct, detailed information, rather than a narrative or references to extensive supporting documents. Do not attach other documents unless they are specifically requested in the questions.

The total submission should be no more than 10-12 pages on a single classification of change. The submission should be no more than 20 pages total on an application addressing multiple change requests.

Submit the completed application as a single electronic document (in Adobe PDF format) emailed to [changerequests@hlcommission.org](mailto:changerequests@hlcommission.org).

**Requested Change(s).** *Concisely describe the change for which the institution seeks approval.*

Please Note: If submitting a change request for a new program *and* distance offerings or a new program *and* location, the institution should submit the New Program Application. Otherwise an institution submitting more than one change request should complete multiple applications, one for each type of change.

**Classification of Change Request.** Check all boxes that apply to the change.

*Note: not every institutional change requires prior review and approval. Review the [“Overview of Commission Policies and Procedures for Institutional Changes Requiring Commission Notification or Approval”](#) to make certain that current HLC policy requires the institution to seek approval.*

<p><b>Change in mission or student body:</b></p> <p><input type="checkbox"/> change in mission</p> <p><input type="checkbox"/> change in student body</p>	<p><b>New academic program(s) requiring HLC approval:</b></p> <p><input type="checkbox"/> certificate                      <input type="checkbox"/> bachelor’s</p> <p><input type="checkbox"/> diploma                              <input type="checkbox"/> master’s/specialist</p> <p><input type="checkbox"/> associate’s                              <input type="checkbox"/> doctorate</p>
<p><b>New additional locations:</b></p> <p><input type="checkbox"/> in home state</p> <p><input type="checkbox"/> in other state(s) or in other country(ies)</p> <p><b>New branch campus:</b></p> <p><input type="checkbox"/> new or additional campus(es)</p>	<p><b>Distance Delivery:</b></p> <p><input type="checkbox"/> Initiation of distance education</p> <p><input type="checkbox"/> Expansion of distance education</p> <p><input type="checkbox"/> Initiation of correspondence education</p> <p><input type="checkbox"/> Expansion of correspondence education</p>

<p><b>Consortial or contractual arrangement:</b></p> <p><input type="checkbox"/> Consortial arrangement</p> <p><input type="checkbox"/> Contractual arrangement</p> <p style="padding-left: 20px;"><input type="checkbox"/> The institution has completed the Screening Form for Contractual Arrangements and has been advised that approval is required. (If not, see the Substantive Change Screening Form for Contractual Arrangements)</p>	<p><b>Other:</b></p> <p><input type="checkbox"/> Substantially changing the clock or credit hours required for a program</p>
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**Institutional Context for Substantive Change Review.** *In 1-2 paragraphs, describe the key dynamics — institutional mission and internal or external forces — that stimulated and shaped the change.*

**Special conditions.** *Underline YES or NO attesting to whether any of the conditions identified below fit the institution. If YES, explain the situation in the box provided.*

Is the institution, in its relations with other regional, specialized, or national accrediting agencies, currently under or recommended for a negative status or action (e.g., withdrawal, probation, sanction, warning, show-cause, etc.)?	YES  NO	
Is the institution now undergoing or facing substantial monitoring, special review, or financial restrictions from the U.S. Dept. of Education or other federal or state government agencies?	YES  NO	
Has the institution's senior leadership or board membership experienced substantial resignations or removals in the past year?	YES  NO	
Is the institution experiencing financial difficulty through such conditions as a currently declared state of exigency, a deficit of 10% or more, a default or failure to make payroll during the past year, or consecutive deficits in the two most recent years?	YES  NO	
Is the institution experiencing other pressures that might affect its ability to carry out the proposal (e.g., a collective bargaining dispute or a significant lawsuit)?	YES  NO	

**Approvals.** Check the approvals that are required prior to implementing the proposed change and include documentation of the approvals to the request.

- Internal (faculty, board) approvals
  - System approvals (for an institution that is part of a system)
  - State approval(s) for requests other than for Distance Delivery
  - For Distance Delivery only: process in place to ascertain and secure state approval(s) as required
  - Foreign country(ies) approvals (for an overseas program or site)
  - No approval required
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### Specialized Accreditation

Complete this section only if specialized accreditation is required for licensure or practice in program(s) covered by this change application.

- The institution has already obtained the appropriate specialized accreditation. Attach a copy of the letter from the agency granting accreditation.
  - The institution has begun the process of seeking or plans to seek specialized accreditation. Specify the name of the agency and the timeline for completing the process. (If approval is a multi-stage process, the institution should contact the HLC staff liaison to discuss the timeline before submitting this change application form.)
  - The institution does not plan to seek specialized accreditation. Provide a rationale for not seeking this accreditation.
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### Changes Requiring Visits

Complete this section only if the institution is already aware that the proposed change will need to be reviewed through a visit. (If the institution is unsure whether a visit is required, the Commission will advise the institution based on the information provided in the change application.)

- Request to schedule a Change Visit.  
If a Change Visit has already been planned in consultation with Commission staff, specify the date set for the visit: \_\_\_\_\_
- Request to add a proposed change to an already scheduled visit. Specify type of visit and date scheduled: \_\_\_\_\_

Whether the change will be reviewed through a separate Change Visit or embedded in an already scheduled visit, the following schedule will apply.

1. The institution files Part 1 of this change form at least 4 months before the visit. If the visit has not already been scheduled, this filing will initiate the process of scheduling the visit.
  2. The institution files Part 2 of this change form at least 2 months before the scheduled visit. If the change will be embedded in an already scheduled visit, the form should be filed as an attachment to the report prepared for that visit.
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*Please note: The Commission plans to update the change forms annually, on or about September 1 of each*

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*year. However, if a Change Application form was accessed more than 90 days prior to filing, it is recommended that the institution visit <http://www.ncahlc.org/change> to ensure that there have been no changes in the application form in the intervening time.*

<p style="text-align: center;"><b>Substantive Change Application, Part 2: Topic-Specific Questions</b></p> <p style="text-align: center;"><b>Distance Delivery</b></p>
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**Submitting a Substantive Change Request**

Attach the “Substantive Change Application–General Questions” as page one of this application. That completed form and the answers to the questions below will constitute the request for approval of a substantive change. It will be provided to future HLC review processes.

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Name of Institution:

**Part 1. Characteristics of the Change Requested**

1. Briefly describe the planned initiation or expansion of distance delivery the institution is requesting permission to operate.
2. Include a list of all proposed certificate and degree programs planned in the initiation or expansion of distance delivery. For each degree program or certificate:
  - a. Indicate the Classification of Instructional Programs [CIP codes, program name, and additional description (optional)]. CIP codes are established by the U.S. Department of Education’s National Center for Education Statistics. More information is available at <http://nces.ed.gov/ipeds/cipcode/>.
  - b. Specify the program level.
  - c. Specify if it is **distance education** or **correspondence education**.
  - d. Specify all modalities of delivery.

<input type="checkbox"/> Audio conferencing	<input type="checkbox"/> internet
<input type="checkbox"/> Broadband lines	<input type="checkbox"/> microwave
<input type="checkbox"/> cable	<input type="checkbox"/> open broadcast
<input type="checkbox"/> closed circuit	<input type="checkbox"/> satellite
<input type="checkbox"/> correspondence	<input type="checkbox"/> videocassettes, dvds, and cd-roms
<input type="checkbox"/> fiber optics	<input type="checkbox"/> wireless communication devices
  - e. Identify date the offerings will be launched (MM/DD/YYYY).

If seeking approval for courses only, provide a list of the courses and answer b – e, above.

3. What organizational structures are in place to ensure effective oversight, implementation, and management of the institution’s distance-delivered offerings?
4. Does the institution have a separately identified organizational unit for providing or marketing the distance-delivered offerings? ( ) Yes ( ) No

If yes, please explain how this separate unit coordinates with other academic and administrative units across the institution to ensure the consistency and quality of offerings.

5. If the institution is planning any involvement by external organizations (other than accredited higher education institutions) in key operations as identified below, provide the information requested for each planned involvement. (Note that such involvement by a parent company or by one of its subsidiaries external to the institution in any of these operations should be reported.)

Type of involvement	Name(s) of external organization(s)	% of Involvement
A. Recruitment and admission of students		
B. Course placement and advising of students		
C. Design and oversight of curriculum		
D. Direct instruction and oversight		
E. Other Support for delivery of instruction		

6. If the institution is planning any involvement with other accredited higher education institutions in key operations identified above, provide the name(s) of the other institutions and the nature of the involvement.

7. Operational Data

Operational Data	Last year (actual tallies)	This year (estimate)	Next year (projected)
A. Total number of academic programs (i.e., counting different majors at all levels). Do not include certificates.			
B. Total number of programs in item A above available via distance delivery (i.e., 50% or more of courses available as distance-delivered courses)			
C. Percentage of programs available via distance delivery (100 x B/A)			

**Part 2. Institution's History with Distance-Delivered Offerings**

8. Briefly describe the institution's experience with distance-delivered offerings.
9. If the Higher Learning Commission approves the institution's initiation or expansion of distance delivery, what future growth does the institution anticipate (e.g., in the next six months, three years, 10-20 years)?
10. How does the institution plan to manage this growth?

### **Part 3. Institutional Planning for Distance-Delivered Offerings**

11. What impact might the proposed initiation or expansion of distance-delivered offering(s) have on challenges identified as part of or subsequent to the last comprehensive visit or reaffirmation panel and how has the institution addressed the challenge(s)?
12. How does the institution determine the need to expand or initiate a distance-delivered offering? If the institution offers a traditional program now, how does it decide whether to start offering this program via distance delivery?
13. How does the institution plan for changes and future expansion of the role distance delivery plays in the institution? Who is involved? How do new ideas and initiatives originate, and how are they examined and evaluated?
14. How does the institution ensure that financial planning and budgeting for distance-delivered offerings are realistic? What are the institution's projected revenues and expenses?
15. How does the institution assure that promotion, marketing, and enrollment of its distance-delivered offerings stay in balance with its actual resources and technical capabilities?
16. What controls are in place to ensure that the information presented to students in advertising, brochures, and other communications will be accurate?

### **Part 4. Curriculum and Instructional Design**

17. How does the institution assure good instructional design in its distance-delivered offerings? How are the institution's faculty and quality control mechanisms involved in the instructional design process?
18. What processes and procedures will the institution use for technology maintenance, upgrades, back up, remote services, and for communicating changes in software, hardware or technical systems to students and faculty?
19. How does the institution assure that it provides convenient, reliable, and timely services to students or faculty needing technical assistance, and how does it communicate information about these services?
20. What is the institution's experience, if any, in collaborating with other institutions or organizations to provide distance-delivered education?
21. If the institution is planning partnerships or agreements with external organizations or institutions as identified in Questions 5 and 6, how will the institution ensure that students can use these services effectively?

### **Part 5. Institutional Staffing and Faculty Support**

22. How does the institution staff distance-delivered programs? How does this differ from the institution's processes for staffing traditional programs?
23. What is the institution's process for selecting, training, and orienting faculty for distance delivery? What special professional development, support, or released time does the institution provide for faculty who teach distance-delivered offerings?
24. How does the institution assure copyright compliance and keep distance delivery faculty aware of

institutional policies on using others' intellectual property?

### **Part 6. Student Support**

25. How does the institution assure that distance delivery students have access to necessary student and support services (e.g., institutional information, application for admission, registration, tutoring or academic support, advising, financial aid, tuition payment, career counseling and placement, library resources, complaint processes)? How does the institution provide them information about using these services, and how does it monitor and evaluate their use of these services?
26. How does the institution measure and promote interactions among distance delivery students and faculty (e.g., email, online chats, discussion groups, phone or streaming audio, "office hours," cyber buddies/mentors and tutors)?
27. How does the institution assure that the distance delivery students it enrolls and to whom it awards credit and credentials are the same ones who did the work and achieved the institution's learning goals (student authentication)?
28. How does the institution protect student identity and personal information?

### **Part 7. Evaluation and Assessment**

29. How does the institution assess, review, and evaluate quality in distance-delivered offerings?
30. How are the measures and techniques the institution uses for distance-delivered offerings equivalent to those used to assess and evaluate traditional face-to-face offerings? If there are differences, why are these differences appropriate?
31. How does the institution assess the learning of the students it educates in its distance-delivered offerings to ensure that they achieve the levels of performance that the institution expect and that its stakeholders require?
32. How does the institution encourage and ensure continuous improvement of its distance-delivered offerings?