THE NUTS AND BOLTS OF SUBSTANTIVE CHANGE: Per ACEN Policy

Brought to you by ACEN, NEPIN, and OADN

WELCOME!

• For those of you joining us on February 26, 2020, you will be able to ask questions of ACEN staff by entering your written question in the “chat” section of the meeting.

• ACEN staff will respond directly to you using the same channel of communication.

Objectives

• Describe the purpose of the ACEN's substantive change policy.
• Describe the basic substantive change process and potential outcomes.
• List key considerations for common, reportable substantive changes.
• Describe best practices for writing a substantive change report.
Substantive Change: Background

• The Accreditation Commission for Education in Nursing (ACEN) is recognized by the U.S. Department of Education (USDE) as an accrediting agency for nursing education programs and schools, both postsecondary and higher degree.

• In order to maintain this critical USDE recognition the ACEN must maintain compliance with the federal Higher Education Act (HEA).

• 34 CFR § 602.22: Substantive Change – Revised regulations will be effective July 1, 2020.

ACEN: Substantive Change

• A substantive change is a significant modification or expansion of the nature and scope of a nursing program and/or nursing education.

• ACEN Policy #14 Substantive Change is consistent with federal regulations and is designed to help ensure that the program maintains compliance with the Standards and Criteria, thus protecting students.

• The policy is currently under review and revisions are anticipated.

Substantive Change Policy:

• Policy Statements
• Nursing Program Responsibilities and Obligations
• Substantive Change Summary Table
• Reporting Procedure
• Commission Responsibilities and Actions
Substantive Change: Programs in Candidacy

- **Policy #34**: Candidacy for a Governing Organization/Nursing Program Seeking Initial Accreditation:
  - Change in nurse administrator;
  - Relocation of the nursing program;
  - Change in status with state regulatory agency;
  - Change in status with the governing organization’s accrediting agency;
  - Addition/Deletion of a nursing program option; and
  - Addition/Deletion of an off-campus location.

- Do NOT submit through the Substantive Change portal.

Recap:

- Policy #14 applies only to accredited programs.
- Policy #34 addresses substantive change for programs in Candidacy.
- A change is **substantive** if:
  - It is a significant modification or expansion of the nature and scope of a nursing program, nursing education unit, or governing organization.
  - The change is new since the last accreditation review.

Substantive Change Procedure Examples:

- **Procedure 1**
  - Increase in enrollment of 50% or > by headcount in one academic year.
  - Establishing a new off-campus instructional site at which 50% or more of the (nursing) credit hours can be obtained.

- **Procedure 2**
  - Increase in enrollment of 25-49% by headcount in one academic year.
  - Establishing a new off-campus instructional site at which 1-49% of (nursing) credit hours can be obtained.

- **Procedure 3**
  - Closing of a nursing program or closing an off-campus instructional site at which a nursing program is offered (teach-out plan/teach-out agreement required).

- **Procedure 4**
  - Change in nurse administrator.
  - Change in outcomes (e.g., licensure examination pass rate <80%).
Substantive Change: Review Process

Procedure 1

Staff Review → Substantive Change Committee → Board of Commissioners' Decision

Important Notes:
- The ACEN staff review all substantive change submissions.
- The ACEN reserves the right to classify significant changes, other than those included in Policy #14 and to follow-up accordingly.
- Any substantive change submission may be referred to the Board of Commissioners for review and decision-making.
- Programs granted continuing accreditation with warning or for good cause may not implement a substantive change until the accreditation stipulations have been resolved.
Potential Commission Actions:

- Approve the substantive change.
- Approve the substantive change and authorize a focused visit.
- Approve the substantive change and require a written report within a specified timeframe.
- Request additional information, the due date for the additional information may not exceed one calendar year.
- Deny the substantive change; may also authorize a focused visit.

Potential ACEN Staff Actions:

- Accept the required documentation; no further information is needed.
- Request additional information; the due date for the additional information may not exceed one year from the date of the report.
- Refer the substantive change request of the Board of Commissioners for consideration and possible further action.

Substantive Changes: Major Categories

- Curriculum
- Program Outcomes
- Distance Education
- Programs/Program Options
- Change in Status
- Instructional Sites/Branch Campuses/Relocations
- Enrollment
- Mission and Governance
- Consortia/Contractual Agreements
- Miscellaneous
  - ACEN or BOC request
  - Something “major” (as determined by the program)
Submitting a Substantive Change:

• Review Policy #14 and determine if reporting is required.
• Use Template for the identified substantive change.
• Keep narrative clear and concise.
• Complete program demographics and upload template and any required files.
• Confirmation of receipt email will include a “ticket” number, keep track of this number!

Most Commonly Reported Substantive Changes:

• Change in Nurse Administrator
• New Off-Campus Instructional Site
• New Program Option
• Curriculum
• Change in Program Outcomes

Change in Nurse Administrator:

• Key Elements:
  • Date of appointment
  • Overview of institutional and state requirements for the role
  • Job description
  • State rules and/or regulations
  • Orientation and mentoring plan
• Need to include:
  • Letter of appointment
  • CV
  • Licensure verification
  • Waivers as applicable
New Off-Campus Instructional Sites:

- **Key Elements:**
  - Implementation date
  - Percent of program of study taught at the location
  - Address of the location
  - Program outcomes

- **Describe resources:**
  - Student services
  - Faculty
  - Support staff
  - Fiscal, physical and technological
  - Impact on enrollment

New Program Options:

- **Key Elements:**
  - Adding a nursing program option within a nursing program by DELETING and/or SUBSTITUTING 50% or more of the existing nursing courses to form the new program option (Procedure 1)
  - Adding a nursing program option within a nursing program by DELETING and/or SUBSTITUTING 1-49% of the existing nursing courses to form the new program option (Procedure 2)

- **Program Outcomes**

- **Describe:**
  - Resources
  - Curriculum
  - Method of Delivery
  - Impact on enrollment

Curriculum:

- **Key Elements:**
  - Increase, decrease, or substitution of 50-100% of the (nursing) credit hours that represents a significant departure in the nursing content from the currently accepted/approved nursing course. (Procedure 1)
  - Increase, decrease, or substitution of 25-49% of the (nursing) credit hours that represents a significant departure in the nursing content from the currently accepted/approved nursing course. (Procedure 2)
  - Program outcomes
Curriculum: (continued)

- **Describe:**
  - Most Criteria in Standard 4 Curriculum
  - Faculty development
  - Teach out plan for existing curriculum

- **Curriculum Questions to Consider:**
  - Is the content "new" or is it a redistribution of content?
  - Is the change related to how the content is structured or organized?
  - General principle:
    - Significant departure of content

When calculating the percentage of curriculum change:

- **Curriculum changes that do not count:**
  - Changing the title of a course with no significant changes to the content.
  - Changing the exemplars used to teach nursing principles.
  - Combining two courses to create one course with the same total number of credits and substantially similar content.
  - Splitting one course to create two courses with the same total number of credits and substantially similar content.

- **Curriculum changes that do count:**
  - Adding a three-credit hour course to the nursing sequence with content that was not previously included in the curriculum.
  - Developing a four-credit hour course to replace an existing three-credit hour course.
  - Deleting a three-credit hour course from a program of study with no equivalent in the new/revised curriculum.

Change in Program Outcomes:

- **Key Elements:**
  - Licensure/certification pass rates below the ACEN Criterion (6.2).
  - Program completion rate 25% or more below program’s ELA for two consecutive academic years; or 40% below the program’s ELA during a single academic year.
  - Program job placement rate 30% or more below program’s ELA for two consecutive academic years; or 45% below the program’s ELA during a single academic year.
**Change in Program Outcomes: Licensure/Certification**

**Reminders:**
- Must consistently use the same 12-month reporting period to determine pass-rate.
- Must include all first-time test takers during the same 12-month period, regardless of when they graduated.

**Describe:**
- Contributing factors
- Program administration considerations
- Faculty considerations
- Plan for improvement

**Change in Program Outcomes: Program Completion**

**Reminders:**
- ACEN definition of program is the number of students who complete the program in no more than 150% of the stated nursing program length beginning with enrollment on the first day in the first nursing course.
- Program faculty are responsible for the ELA. The ELA should be high enough to be genuine and encourage continuous improvement but not so high as to be idealistic and, thus, unachievable.

**Describe:**
- Contributing factors
- Program administration considerations
- Faculty considerations
- Plan for improvement

**Program Outcomes: Job Placement**

**Reminders:**
- ACEN definition of job placement is the percentage of all graduates who are employed in a position for which the program prepared them.
- Program faculty are responsible for the ELA. The ELA should be high enough to be genuine and encourage continuous improvement but not so high as to be idealistic and, thus, unachievable.

**Describe:**
- Contributing factors
- Program administration considerations
- Faculty considerations
- Plan for improvement
Calculating Percentage Change from ELA:

- The calculation of the percentage change from the ELA for program completion and job placement is proportional to the program’s ELA.

- **For example:**
  - If the program’s ELA is 100%, then 25% below that would be 75%.
  - If the program’s ELA is 50%, then 25% below that would be 37.5%.

Substantive Change: FAQs

- Is it too early to submit my substantive change?
- Do I have to wait for approval from my Board of Nursing before I submit?
- The template is asking me to describe how the change impacts a certain Criterion and I don’t think it applies. How should I address this?

Substantive Change: FAQs

- Why do I have to submit information about my program outcomes, the change I am reporting has nothing to do with outcomes?
- My substantive change was reviewed by the Board of Commissioners. How long will it take for me to receive a response?
- Why does the process take so long?
Final Thoughts:

- The substantive change policy and the submission of a substantive change report is not a punitive process.
- Submission of substantive change reports demonstrates program accountability for maintaining compliance the ACEN Standards and Criteria.
- Reporting substantive changes provides programs an opportunity to formalize and document their ongoing development and program improvement processes.

*Remember, this is always about the students and what is best for the students!*

ACEN Resources:

- ACEN Policy Manual
- ACEN Glossary
- ACEN Website:
  - Substantive change templates
  - Substantive change submission portal
  - Substantive change inquiry link
- ACEN Staff: 404-975-5000
  - Substantive Change Coordinator and Reports Processor
  - ACEN Directors/Professional Staff

THANK YOU

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