ACAHM Accreditation Commission for Acupuncture and Herbal Medicine

Policy Title: Notification of Change Policy

Approved By: ACAHM Executive Committee

Document History: Implementation Date: 1 July 2012

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Related Commission Policies: Glossary; Accreditation Procedures; Branch Campus Policy; Change in Mission,

<u>Legal Status, Ownership or Form of Control Policy;</u> <u>Distance Education Policy;</u> Schedule of Fees and Dues; Public Disclosure Policy; Site Visit Manual; Program

Naming Policy

References: 34 CFR 602.22; 20 U.S.C. § 1099(b); 34 CFR 668.5; Federal Student Aid Handbook

Responsible Official: ACAHM Director of Accreditation Services

Policy Summary: This guidance outlines the Accreditation Commission for Acupuncture and Herbal Medicine's notification requirements related to institutional changes.

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A. Background

The Accreditation Commission for Acupuncture and Herbal Medicine (ACAHM or Commission) accredits throughout the United States professional non-degree and graduate degree programs, including professional doctoral programs, in the field of acupuncture as well as freestanding institutions and colleges that offer such programs, including programs offered via distance education. Accordingly, ACAHM functions as both an <u>institutional accrediting agency</u> and, for specific institutions that have been granted either regional or national accreditation by another accrediting agency recognized by the U.S. Department of Education, ACAHM may serve as a <u>programmatic accrediting agency</u>. In keeping with federal law and Commission policy, institutions/programs accredited by ACAHM are required to notify and, in some cases receive prior approval from, the Commission for certain changes.

Institutions are strongly encouraged to timely contact the Commission to discuss potential changes being considered, to seek clarification on notification and fee requirements, and to obtain the appropriate substantive change instructions/application. The Commission may, at its discretion, review other institutional changes not listed here that impact the institutions/programs. **Refer to ACAHM's Glossary for additional information.**

B. Notification requirements for institutions and programs

ACAHM-accredited or pre-accredited institutions and programs are required to inform the Commission, pay any associated fees and, in some cases, seek prior approval of change according to the following three categories of changes:

- 1. Changes that are defined as **Substantive Change** under Federal Law and/or by ACAHM Policy that require approval of the Commission prior to implementation of the change,
- 2. Changes that require prior notification and review by the Commission, and
- 3. Changes that require notification to the Commission after a precipitating event or implementation of the change.

1.00 Changes requiring Commission approval prior to implementation of the change

General Terms

- a. The Commission confines its substantive change review to the Accreditation Record when determining whether an institution/program meets ACAHM *Eligibility Requirements* and/or complies with ACAHM *Standards and Criteria for Accreditation*, policies and procedures, and/or its *Code of Conduct and Professional Ethics Guide*. Based on its review, the Commission may take actions to ensure continued compliance and/or obtain more information to make a decision regarding substantive change approval. The Commission reserves the right to expand the breadth and depth of its review. For example, the Commission may require supplemental information up to and including submission of a comprehensive self-study and/or require the institution/program host a comprehensive or focused site visit.
- b. Substantive changes may not be initiated by the institution or program until prior approval is received from the Commission. The approval specifies the effective date and is not retroactive.
- c. The Commission, at its discretion, reserves the right to: permit notification in less than the applicable notice period indicated below, deny or defer implementation of a substantive change request, or require an institution/program to suspend implementation of a substantive or other institutional change pending Commission action.
- d. Substantive change applications are available from the Commission's executive office and/or its accreditation management system.
- e. The Commission will only accept substantive change requests for the addition of a new program from those institutions (and their branch campuses where applicable) that are in compliance with all Accreditation Criteria further classified as Eligibility Requirements. Institutions/programs under an ACAHM sanction or an Order To Show Cause are ineligible to add new programs.

- f. Institutions in pre-accreditation (candidacy) status have not yet demonstrated compliance with Commission <u>Standards and Criteria for Accreditation</u> and are therefore ineligible to add new programs until initial accreditation is achieved.
- g. When an institution that offers any ACAHM-accredited program seeks to add an ACAHM-accreditable program, the institution must receive substantive change approval from the Commission for that program or programs under this *Notification of Change Policy*.
- h. Substantive change approval to add an ACAHM-accreditable program expires if the program does not begin enrolling students within eighteen (18) months of the substantive change approval.
- i. When a school that participates in Federal Financial Aid anticipates a change in ownership or acquisition of an additional location, it should notify its <u>School Participation Division</u> as early as possible to ensure that it remains in compliance with the requirements of *34 CFR 600.20(q)*.
- **1.01** A change in location of a main campus, branch campus or additional location.

Initial Level of Review: Review Committee

Notification Timeframe: Submission ninety (90) days prior to desired implementation.

Site Visit: Post-implementation verification visit is required within six (6) months.

1.02 The addition of a location offering 50% or more of an ACAHM-accredited program.

Initial Level of Review: Review Committee

Notification Timeframe: Submission ninety (90) days prior to desired implementation.

Site Visit: Post-implementation verification visit is required within six (6) months.

Commission Comments:

- Additional locations that are approved by the Commission to offer existing ACAHM-accredited programs are extended the accreditation status of those programs consistent with the main campus.
- 2. The addition of new program at an additional location requires separate substantive change approval.

Note: Public disclosure is required for this substantive change. Specific required public disclosure language will be included in an action letter for this substantive change. Please see section C, of this policy, *Public disclosure of institutional changes*.

1.03 The establishment of a branch campus.

Initial Level of Review: Review Committee

Notification Timeframe: Submission six (6) months prior to desired implementation.

Site Visit: Post-implementation verification visit is required within six (6) months.

Commission Comments:

- 1. A branch campus is considered quasi-independent of an institution's main campus and, therefore, must attain programmatic accreditation independent of the main campus for any ACAHM-accreditable programs offered.
- 2. In general, institutions seeking to establish a branch campus must submit a substantive change application that includes a self-study for the proposed branch campus. The self-study report must include but is not limited to:
 - a. an official statement from the institution describing the hiring authority of the proposed branch location;
 - b. a specific description of the relationship between the main campus of the institution and all its branches;
 - c. a description of the student aid processing that is performed by the main campus and that is or will be performed at the proposed branch campus;
 - d. an operating budget for the proposed branch campus that includes projected revenues, expenditures, and expected cash flow;
 - e. consolidated financial statements for the main campus's two previous years and a breakdown of the institution's financial circumstances; and
 - f. a business plan for the proposed branch campus that describes the educational program(s) to be offered, and a description of the operation, management, and physical resources required to operate.
- 3. The addition of a new program at a branch campus requires separate substantive change approval.

Note: Public disclosure is required for this substantive change. Specific required public disclosure language will be included in an action letter for this substantive change. Please see section C, of this policy, *Public disclosure of institutional changes*.

1.04 The acquisition of any other ACAHM-accreditable institution or any ACAHM-accreditable program or location of another institution that offers 50% or more of an ACAHM-accreditable program.

Initial Level of Review: Review Committee

Notification Timeframe: Submission six (6) months prior to desired implementation.

Site Visit: Post-implementation visit is required within six (6) months.

Note: Public disclosure is required for this substantive change. Specific required public disclosure language will be included in an action letter for this substantive change. Please see section C, of this policy, *Public disclosure of institutional changes*.

1.05 The addition of an entry-level (i.e., master's or professional entry-level doctoral) program in acupuncture by an institution that offers an ACAHM-accredited entry-level program in acupuncture with a Chinese herbal medicine specialization at the same degree level.

Initial Level of Review: Staff Review. If the proposed program curriculum is deemed substantively different from the accredited program, additional information or a focused site visit may be required.

Notification Timeframe: Submission ninety (90) days prior to desired implementation.

Note: Public disclosure is required for this substantive change. Specific required public disclosure language will be included in an action letter for this substantive change. Please see section C, of this policy, *Public disclosure of institutional changes*.

1.06 The addition of an entry-level (i.e., master's or professional entry-level doctoral) program in acupuncture with a Chinese herbal medicine specialization by an institution that offers an ACAHM-accredited entry-level acupuncture program at the same degree level.

Initial Level of Review: Review Committee

Notification Timeframe: Submission six (6) months prior to desired implementation.

Site Visit: Post-implementation focused site visit is required.

Note: Public disclosure is required for this substantive change. Specific required public disclosure language will be included in an action letter for this substantive change. Please see section C, of this policy, *Public disclosure of institutional changes*.

1.07 The delivery of an ACAHM-accredited program in a language other than the currently accredited language of delivery. The Commission will only accept substantive change requests for program delivery in English, Mandarin Chinese, or Korean languages.

Initial Level of Review: Review Committee

Notification Timeframe: Submission six (6) months prior to desired implementation.

Site Visit: Post-implementation focused site visit is required.

Note: Public disclosure is required for this substantive change. Specific required public disclosure language will be included in an action letter for this substantive change. Please see section C, of this policy, *Public disclosure of institutional changes*.

1.08 The addition of an ACAHM-accreditable doctoral program [i.e., advanced practice doctoral (DAOM) degree program or professional entry-level doctoral (DAc) degree program].

Initial Level of Review: Review Committee

Notification Timeframe: Submission six (6) months prior to desired implementation.

Site Visit:

Between 6-12 months after the start of student enrollment in an **advanced practice doctoral**, the program/institution must submit a self-study report for accreditation and host a comprehensive site visit in accordance with ACAHM's <u>Accreditation Procedures Policy</u>.

Between 12-18 months after the start of student enrollment in an **entry-level doctoral program**, the program/institution must submit a self-study report for accreditation and host a comprehensive site visit in accordance with ACAHM's <u>Accreditation Procedures Policy</u>.

Note: Substantive change approval to add an ACAHM-accreditable doctoral program permits the program to begin enrolling students but does not confer any accreditation or pre-accreditation status with ACAHM. Public disclosure is required for this substantive change. Specific required public disclosure language will be included in an action letter for this substantive change. Please see section C, of this policy, *Public disclosure of institutional changes*.

1.09 Significant changes in the number of clock hours or credit hours required for successful completion of a program.

Initial Level of Review: Staff Review

Notification Timeframe: Submission ninety (90) days prior to desired implementation.

1.10 Any significant change to the established mission or objectives of an ACAHM-accredited institution since the institution was last evaluated.

Initial Level of Review: Review Committee

Notification Timeframe: Submission ninety (90) days prior to desired implementation.

1.11 Any change in the legal status, form of control, or ownership of an institution.

Initial Level of Review: Review Committee

Notification Timeframe: Submission ninety (90) days prior to desired implementation.

Site Visit: Post-implementation verification visit is required within six (6) months.

Note: See *General Term i.* for 1.00 changes above.

1.12 A decision to cease operations, close an institution, close a branch campus, close an additional location, or close a program.

Initial Level of Review: Staff Review

Notification Timeframe: Submission thirty (30) days prior to planned implementation.

Required Documentation: Proposed Teach-Out Plan [as outlined in ACAHM's Teach-Out Policy].

Note: Public disclosure is required for this substantive change. Specific required public disclosure language will be included in an action letter for this substantive change. Please see section C, of this policy, *Public disclosure of institutional changes*.

1.13 A change in the way the institution measures student progress, including whether the institution measures progress in clock hours or credit-hours, semesters, trimesters, or quarters, or uses time-based or non-time-based methods.

Initial Level of Review: Staff Review

Notification Timeframe: Submission ninety (90) days prior to desired implementation.

1.14 Entering a written arrangement (consortium or contractual agreement) with another institution or organization, whether or not the other institution is certified to participate in Title IV, HEA programs, to offer more than twenty-five (25) percent of one or more of the ACAHM-accredited institution's educational programs.

Initial Level of Review: Staff Review

Notification Timeframe: Submission ninety (90) days prior to desired implementation.

1.15 The addition of distance education offerings [i.e., course(s)/program(s)].

Initial Level of Review: Review Committee

Notification Timeframe: Submission six (6) months prior to desired implementation of the first distance education course(s)/program(s).

Required Documentation: When ACAHM is not the institution's accreditor, the institution must provide documentation demonstrating state authorization and institutional accreditor approval of distance education methodologies.

Note: Refer to ACAHM's Distance Education Policy.

1.16 The addition of an ACAHM-accreditable certificate program.

Initial Level of Review: Review Committee

Notification Timeframe: Submission ninety (90) days prior to desired implementation.

Site Visit: Post-implementation verification site visit is required.

Note: Public disclosure is required for this substantive change. Specific required public disclosure language will be included in an action letter for this substantive change. Please see section C, of this policy, *Public disclosure of institutional changes*.

2.00 Changes requiring prior Commission notification and review

General Terms

ACAHM-accredited and pre-accredited institutions and programs must timely notify the Commission, pay any associated fee and provide appropriate supporting documentation prior to implementing the changes identified below. Notification of change applications are available from the Commission's executive office and/or its accreditation management system. Notifications must be signed by the school's president or designee. Normally, these changes do not require Commission prior approval or a site visit. However, at ACAHM's discretion, these changes may require further documentation, a higher-level review, a focused site visit, or prior approval by the Commission. **Refer to ACAHM's Glossary for additional information.**

2.01 Any significant change to present facilities.

Initial Level of Review: Staff Review.

Notification Timeframe: Submission thirty (30) days prior to planned implementation.

Required Documentation: Narrative addressing rationale for the change to facilities and its impact to ACAHM-accredited programs.

2.02 Any significant change to an ACAHM-accredited program.

Initial Level of Review: Staff Review.

Notification Timeframe: Submission thirty (30) days prior to planned implementation.

Required Documentation: Narrative addressing rationale for the change to the ACAHM-accredited program and its impact.

2.03 Any change in the name of an ACAHM-accredited institution **or** any change in the name of an ACAHM-accredited program.

Initial Level of Review: Letter of Notification to ACAHM

Notification Timeframe: Submission sixty (60) days prior to planned implementation.

Required Documentation: Narrative addressing rationale for the change in name of the institution **or** rationale for the change in name of the accredited program(s), the anticipated effective date of the name change implementation, and anticipated date that a degree with the new name will be conferred; and

- 1) Evidence of institutional accreditor approval of name changes, if applicable.
- 2) Evidence of state higher education authority approval of name changes, if applicable.
- **2.04** Bankruptcy or reorganization filings.

Initial Level of Review: Staff Review

Notification Timeframe: Submission thirty (30) days prior to filing a petition for bankruptcy or reorganization.

Required Documentation: Copy of the petition for bankruptcy or reorganization.

2.05 Voluntary withdrawal of accreditation from ACAHM or another accrediting agency.

Initial Level of Review: Staff Review

Notification Timeframe: Submission thirty (30) days prior to voluntarily withdrawing accreditation.

Required Documentation: Narrative explaining the reasons for withdrawing accreditation.

Note: Public disclosure is required for this substantive change. Specific required public disclosure language will be included in an action letter for this substantive change. Please see section C, of this policy, *Public disclosure of institutional changes*.

2.06 Suspending student matriculation in an ACAHM-accredited/pre-accredited program for a period not to exceed one calendar year.

Initial Level of Review: Staff Review

Notification Timeframe: Submission within thirty (30) days of a decision to suspend student matriculation.

Required Documentation: 1) Narrative explaining the reason(s) for not enrolling new students in an ACAHM accredited/pre-accredited program and the anticipated positive and negative impacts the enrollment suspension may have on the program's continuation, 2) a detailed plan with timelines, signed by the president and Board chair, describing actions that will be taken for resuming student matriculation into the suspended program, and 3) copies of the most current financial statements (including but not limited to the then current budget and cash flow statements reflecting the previous quarter's financial performance, and a 2-year projected budget

specific to the program at issue) and a narrative describing the current and expected financial impact if the student enrollment suspension is granted.

Note: Public disclosure is required for this substantive change. Specific required public disclosure language will be included in an action letter for this substantive change. Please see section C, of this policy, *Public disclosure of institutional changes*.

3.00 Changes requiring post-implementation notification

General Terms

ACAHM-accredited and pre-accredited institutions and programs must timely notify the Commission of any material event or circumstance that will or could affect the institution/program's operations, policies, staff, curricula, reputation, approval status, financial status, or authority to operate as a legal entity. Notification of change applications are available from the Commission's executive office and/or its accreditation management system. Notifications must be signed by the school's president or designee.

These notifications are in addition to disclosures required in applications for pre-accreditation (candidacy), initial accreditation, continuing accreditation, annual reports, any substantive change report, or non-substantive change notification. ACAHM will review the notification and either accept the notification or at ACAHM's discretion, require further documentation, a higher-level review, a focused site visit, or other Commission action.

- **3.01** Actions taken by external agencies that may affect the accredited or pre-accredited institution/program including, but not limited to:
 - Any action against an institution or program to deny, limit, suspend, or terminate student loan guarantees or participation in external programs by a guaranty agency or the U.S. Department of Education or any determination in accordance with requirements of the U.S. Department of Education that the institution is not meeting its requirements.
 - Any limitation or sanction (i.e., warning, suspension, show cause order, imposition of probationary status, or denial or withdrawal of accreditation) issued by a state or local authorizing agency or other applicable regulatory agency (i.e., Department of Consumer Affairs, Attorneys General, zoning board, etc.) because an institution or program is not meeting applicable requirements or is in violation of any law.
 - Investigations by local, state or federal authorities, beyond those required in the normal course, related to an institution's licensure, approval to operate, program approval(s), or participation in federal programs.
 - Any grant of accreditation or any issued sanction (i.e., warning, suspension, show cause order, imposition of probationary status, or denial or withdrawal of accreditation) by another accrediting agency.
 - Any action to deny, limit, suspend, withdraw, revoke or terminate an institution or program's approval or recognition by any agency that grants certification or licensure to its graduates.
 - Any criminal or civil action filed by local, state (including state-supported legal assistance agencies) or federal authorities against the institution, its officers, or employees.

• The results of any lawsuit or investigation brought against the institution, its officers, or employees that determine an institution or program is not meeting applicable requirements or is in violation of law or regulation.

Initial Level of Review: Staff review

Notification Timeframe: Submission within thirty (30) days of the institution/program's receipt of official notification and/or agency letter.

Required Documentation: 1) Copy of the official notification and/or agency letter disclosing the rationale for its action, and 2) the institution or program's response to the official notification including of all relevant documents and any remediation plan proposed to address the agency's action.

3.02 Any qualified or adverse statement, or statement related to an institution's status as a "going concern," included in an audited financial statement or financial review report.

Initial Level of Review: Staff Review

Notification Timeframe: Submission within thirty (30) days of receiving audited financial statement or financial review report.

Required Documentation: 1) Opinion letter, 2) audited financial statement or financial review, and 3) a remediation plan to address the financial issue(s) cited.

3.03 A change in leadership of administration or governing body.

Programs/institutions must report any changes of the following personnel:

- (a) President/chief executive officer responsible for the operation of the institution;
- (b) Chair of the governing body, as defined in *Criterion 3.01* of the Commission's *Comprehensive Standards and Criteria*;
- (c) Designated accreditation liaison for the institution/program;
- (d) Administrator(s) responsible for direct management of the daily operations of ACAHMaccredited program(s);
- (e) Contact person responsible for receiving ACAHM's billing and invoice communications.

Initial Level of Review: Staff Review

Notification Timeframe: Submission within thirty (30) days of the change, including both departures and appointments.

Required Documentation relevant to change(s) above: Full name, Email and telephone contact information, and CV/resume for each individual reported.

3.04 Any matter that may be deemed to significantly impact the character or quality of the institution or ACAHM-accredited program.

Initial Level of Review: Staff Review

Notification Timeframe: Submission within thirty (30) days of the date the institution or program became aware of the matter at issue.

Required Documentation: Summary of the change and explanation of the impact to the institution or ACAHM-accreditable program.

3.05 A twenty percent (20%) or more increase or decrease in the size of the faculty or student population as compared to the annual report the institution submitted to ACAHM for the previous year.

Initial Level of Review: Staff Review.

Notification Timeframe: Submission within thirty (30) days after the institution becomes aware of the increase or decrease.

Required Documentation: Narrative analyzing the impact of the increase or decrease on the capacity of the institution and its ACAHM-accreditable programs to continue meeting ACAHM accreditation standards.

3.06 The destruction of an institution or a significant part of its facilities.

Initial Level of Review: Staff Review

Notice: Subject to emergency response, as soon as possible after the event.

Required Documentation: Narrative description of impact to the institution or ACAHM-accreditable program, the planned response, and stakeholder notification.

C. Public disclosure of institutional changes

Certain institutional changes require public disclosure to ensure that members of the public are provided full and accurate information concerning the institution/program. Institutions that have submitted institutional change applications/notifications will receive an action letter from ACAHM that approves, requests additional information, defers, or denies the change in accordance with Commission policies. When changes are approved, the Commission's action letter will include required public disclosure language applicable to the change along with any other specific findings or actions of the Commission.

The following types of changes require public disclosure:

Category 1 Changes: 1.02; 1.03; 1.04; 1.05; 1.06; 1.07; 1.08; 1.12; 1.16

Category 2 Changes: 2.05; 2.06

ACAHM may, at its discretion, require public disclosure for other institutional changes not identified here. In such cases, ACAHM will provide the specific public disclosure language and requirements.

Revision History

Date Revised	Summary of Revisions	Approved By
161115	Refreshed and Reformatted.	ACAOM Executive Director
161212	Modified Programmatic Accreditation section, Category 1	ACAOM Executive Director
161220	Modifications requested by ACAOM Executive Director	ACAOM Executive Director
170308	Revisions to 1.0 and 3.1; addition of 3.6; revisions to Public Disclosure	ACAOM Executive Director
170518	Typographical corrections; revisions to 1.16, 2.9 and tables	ACAOM Executive Director
170615	Modifications to 1.11, 1.12 and 2.5 [Institutional]	ACAOM Executive Director
180330	Comprehensive policy revision for clarity, readability and user friendliness; consolidation and reconciliation of institutional and programmatic change notification requirements; addition of 2.6 and revision of 3.5	ACAOM Executive Committee
180615	Non-substantive correction of numbering and table layout, edit of 1.02 for consistency	ACAOM Executive Director
180811	Addition of General Terms C. on page 2	ACAOM Commission
181020	Removal of 1.13, with conditions addressed via 1.01-1.02-1.03; revision of 1.12 to clarify teach-out plan	ACAOM Commission
190716	Throughout policy: changed "MAc degree program" to "entry-level acupuncture degree program"; "post-graduate" doctoral program to "advanced practice" Revision to 1.06: addition of Oriental medicine program changed to addition of Chinese herbal medicine program Revision to 1.08: added 18-month limit to approval Revision to 1.09: removed "program length" Corrected summary of changes requiring public disclosure	ACAOM Executive Director
191211	Revision of 1.06, 1.07, 1.15, 1.16 visit requirement to remove "within 6 mos." Revision of 1.11 site visit requirement from "must" to "may" be required Added site visit may be required to 2.04, 3.02 Non-substantive changes to general language in alignment with recent policy and standard revisions	ACAOM Executive Director
200619	Terminology revision of 1.05, 1.06, 1.08 to correspond with ACAOM's Program Naming Policy	ACAOM Executive Director
220219	Replaced references to ACAOM with ACAHM, except in the revision table; Modified General Terms to require institutions requesting to add new programs be in compliance with all Eligibility Requirements and not under sanction. Removed requirement under 1.07 that program must be accredited in English first. Removed restriction under General Terms that program must be accredited to add distance education. Revision to 1.05, 1.06, 1.07, 1.16: added 18-month limit to approval. Revised note under 1.15 to refer to Distance Education Policy, removed requirement that distance ed courses be delivered in English Minor changes to 3.01 & 3.03.	ACAHM Commission
230206	Specified "entry-level" for existing program under changes 1.05 and 1.06; updated throughout to address changes in 34 CFR 602; adjusted reporting requirements related to implementation of accred. management system; added change 1.13; added required documentation for 2.03; clarified wording of 2.06, added required documentation & removed reference to defunct <i>Interruption</i> policy; summary tables removed	ACAHM Executive Director

240220	Regulatory references added to address written agreements (i.e., 1.14 change requests) – namely 34 CFR 668.5 and Federal Student Aid	ACAHM Executive Director
	Handbook (See specifically Vol. 2 chapter 2); post-implementation SV requirement added for 1.11; billing contact added to 3.03	