

College Procedure: 703. 4 - Reporting Institutional Changes
Policy Reference: 703 – IE Operational
Responsible Department: Institutional Effectiveness
Approval Authority: Cabinet
Procedure Owner: Vice President, Institutional Effectiveness
Effective Date: 8/18/2021

Version Number: 1
Legal Counsel Reviewed (yes/no): No
Legal Reference(s): N/A
Scope: College-wide

Reason for Procedure

Kirkwood Community College has an obligation to report certain changes, some of which may constitute substantive changes under federal regulation, to the Higher Learning Commission (HLC). This procedure determines how Kirkwood will identify and report these changes in compliance with the Department of Education's (DOE) regulation 58834 and the High Learning Commissions (HLC) policy Substantive Change number: INST.F.20.040.

The Procedure

The procedure will define the following:

- Identify Institutional Effectiveness' interaction process with the accreditor to gather and report the program and institutional changes.
- Identify program and institution changes that are substantial, requiring notification to HLC for approval through the substantive process.
- Identify program or institutional changes that require notification to HLC through an inquiry form.
- Identify program or institutional changes that require notification to HLC through a Teach-Out Provisional Plan.
- Describe the process of capturing the information.
- Describe the steps needed to complete reporting.
- Describe what to expect in return from HLC.
- Define standard terms.

Institutional / Program Change Responsibilities

Institutional changes that occur are vetted and identified through Kirkwood's Cabinet Leadership team. Institutional Effectiveness leadership is an active member of this team. All changes are reported to Kirkwood's Accreditation Liaison Officer (ALO). The ALO's is then accountable for reporting Institutional changes to the Higher Learning Commission (HLC).

Kirkwood has a defined process for departments to request and enact programs changes, the [KIN \(SharePoint\) Accreditation](#) site houses this process. The first step in the process is for academic departments to present their program modifications, additions or deletions to the Locus Committee. The Locus Committee consists of the Academic Affairs Leadership Team, Finance, Registrar and ALO. This committee reviews and if approved, the department can move forward in the process with changes. The ALO then documents the approved program change(s) and appropriately reports to the Higher Learning Commission (HLC). The Iowa Department of Education receives Kirkwood's program updates through a Curriculum Management System in partnership with the registrar's office.

Reporting Changes Identified

The following identifies the current changes that the ALO must capture and report to HLC to adhere to the policy. The identified areas are the starting point for reporting, and in some instances may require a further reporting.

Substantive Change

Kirkwood Community College reviews all changes to programs. Significant changes identified below require a Substantive Change Request reported to HLC within 30 days.

Reasons for a Substantive Form to be completed:

1. Change in mission
2. Significant changes in the character or nature of the student body of the institution
3. Establishment of a new campus
4. Closure of a campus
5. Institution Closure
6. Change in institution ownership
7. Outsourcing of a program
8. New program
9. Number of terms to complete a program has changed
10. Addition of a Competency Based Program that uses Direct Assessment
11. Institutional change from credit hours to clock hours or vice versa
12. Change in manner(s) in which the institutions measures a student's progress

Inquiry Change

Kirkwood Community College retains record of inquiry changes. These changes require an inquiry form to be completed. The inquiry form is used to notify HLC of the change and determine if further action on Kirkwood's part is needed. HLC may deem an inquiry as a significant change that requires a substantive change form to be completed.

Reasons for an Inquiry Form to be completed:

1. Course name change or nomenclature change
2. Add or remove optional courses (honors project, independent study, remedial career course)
3. Change in the course order in which a student progresses through the program
4. Addition of minimum grade for graduation that is higher or lower than the prescribed institutional requirement
5. Course modification that does not include content change
6. Program moves to a new department
7. Total required credits to complete a program has changed
8. Change in programs modality
9. Development of a customized Pathway to accommodate student's prior knowledge
10. Change in program or course learning outcomes
Which may also include:
 - a. Required course becomes a list of alternative course(s)
 - b. Add or remove a general education requirement
 - c. Add or remove non-course requirements (third party certificates, safety class or internship)

Provisional Plan (Teach Out)

Kirkwood Community College retains records of program closings or deactivations and is required to complete a provisional plan. A Provisional Plan is required if the closing is handled internally to the college.

Reasons for a Provisional Plan:

1. Program closure (no more students accepted, current students allowed to complete)
2. Program deactivated (students are not allowed to finish program)

A Teach Out submission is required if a program is closing and an external organization is going to handle the program going forward or the institution is closing.

Information Gathering

The ALO has the responsibility to stay up to date with changes to the college and programs. This information is collected in various ways but is centrally stored on the KIN Accreditation site [here](#). The ALO works with Kirkwood's leadership team, academic departments, academic leadership team and the registrar's office to stay abreast of changes occurring to programs and institutionally.

Institution Guidelines

In gathering information for DOE regulation 58834 and HLC policy Substantive Change number: INST.F.20.040, it is the responsibility of the institution to define the interpretation of a 25% change in a program's content. Kirkwood will use the following to track a program's 25% change in content,

- Kirkwood will track the content to the course level;
- If a course(s) is deemed a replacement for an existing course being offered in the program only the credit hours for the new course(s) will be counted;
- If a course is removed from a program offering but was part of an elective group, the course's credit hours will not be counted;
- If a required course was removed from the program, the course's credit hours will be counted;
- If an elective course is added as part of an elective grouping the course will not be counted;
- If a new course is added to the program, as a required course, the program credit hours added are counted.

Kirkwood will use the number of credits to graduate in a program, as the percentage denominator and the changed credit hours (based on the requirements above) as the numerator.

Higher Learning Commission Reporting

Substantive Change

A substantive change to a program or the institution requires a submission and approval from the Higher Learning Commission. If a submission is required, the ALO accesses the HLC [site](#) to start the process. Substantive change submissions and approvals are stored within KIN in the following [directory](#). HLC will take up to 6 months to review and respond to the submission. If further information is needed HLC will send a follow up email to the ALO and college president. HLC will follow the same email protocol once an approval of the submission is complete.

Inquiry

An inquiry change to a program, or the institution requires a submission and approval from the Higher Learning Commission. The ALO will begin by accessing the HLC [site](#) to start the process. The site will guide the ALO to the correct Inquiry Form. Once the submission is complete, HLC will respond in 2 days or less with an email that will either approve or guide the institution on next steps. Inquiry response changes are stored within KIN in the following [directory](#).

Provisional Plan (Teach Out)

A provisional plan lays out how the institution will close out the program. The provisional plan needs to address the following areas;

- State notification,
- how students were notified of the program close out,
- when the institution will stop admitting students, and
- how the institution will allow students to complete the program.

Provisional Plans are stored in KIN under the Accreditation site at [link](#).

References

[Higher Learning Web Site](#)

[Department Of Education Policy](#)

[Higher Learning Commission Policy](#)

[Higher Learning Commission Inquiry form for Changes to Existing Degree Programs](#)

[Higher Learning Commission Substantive Change](#)

[Accreditation KIN Site](#)

Definitions

| Term | Definition |
|----------------------|--|
| HLC | Higher Learning Commission |
| IDOE | Iowa Department of Education |
| DOE | Department of Education |
| Program | A comprehensive, structured approach for delivering academic and career and technical education to prepare students for postsecondary education and career success |
| Course | A class offered by the college. A group of courses leads to the completion of a program. |
| Curriculum Committee | A standing team of faculty and staff members that review and approve curriculum changes. |
| Inquiry Change Form | Documentation to submit to HLC for their direction on further actions that the institution may or may not need to take. This form take 2 weeks to process. |
| Substantive Change | Documentation on a significant change to the institution or program. Before starting a Substantive Change, the institution will submit a Change Form to HLC. HLC will then deem the change substantive and require a Substantive Change form be completed. This form could take up to 6 months for approval. |

Revision Log

| Version Number | Date Approved | Approved by | Brief Description of Change |
|----------------|---------------|-------------|-----------------------------|
| 1 | 9/30/21 | Cabinet | New procedure |
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