GCTEQA

GLOBAL COMMISSION FOR THEOLOGICAL EDUCATION & QUALITY ASSURANCE, INC.

SUBSTANTIVE CHANGE POLICY

2026 Public Policy Edition

Change Responsibly. Protect Learners. Preserve Quality.

Requirements for notification, review, and approval of material changes that may affect an institution's accredited status or scope.

Document Control

Policy Title	Substantive Change Policy
Organization	Global Commission for Theological Education & Quality Assurance, Inc. (GCTEQA)
Edition	2026 Public Policy Edition
Applies To	Applicant and accredited institutions, as applicable
Policy Owner	Board of Directors / Accreditation Governance Function
Review Cycle	At least annually or when accreditation requirements materially change

Core Rule
An accredited institution must notify GCTEQA of material changes that could affect institutional quality, legal authority, governance, financial sustainability, educational scope, learner protection, or the accuracy of its accredited status. Certain changes should be approved before implementation whenever reasonably possible.

1. Purpose

This policy establishes the requirements and procedures for identifying, reporting, reviewing, and acting upon substantive changes involving applicant or accredited institutions. The purpose is to protect students, preserve the integrity of accreditation, ensure that public accreditation information remains accurate, and permit GCTEQA to determine whether an institution continues to satisfy applicable standards after a significant change.

2. Definition of Substantive Change

A substantive change is a significant modification or expansion in an institution's legal status, ownership, governance, location, mission, educational scope, credential levels, delivery model, finances, authorization, or operations that could reasonably affect compliance with GCTEQA standards or the scope of accreditation.

A change may be substantive even when the institution considers it beneficial, temporary, or administrative in nature. When uncertain, the institution should contact GCTEQA before implementation.

3. Institutional Duty to Report

- Institutions are responsible for recognizing and reporting changes covered by this policy.
- Failure to report a required change may itself constitute noncompliance.
- A prior GCTEQA decision does not excuse later reporting when the institution materially alters the facts on which that decision was based.
- Institutions must continue to comply with all governmental, regulatory, professional, and legal requirements independent of GCTEQA review.

4. Changes That Generally Require Prior Approval

The following changes should ordinarily be submitted to GCTEQA before implementation and sufficiently in advance to allow review. As a general planning guideline, institutions should submit the request at least thirty (30) calendar days before the intended effective date whenever practicable:

- Change of ownership, controlling interest, governing control, or legal control of the institution
- Merger, acquisition, consolidation, sale, or transfer of substantially all educational operations
- Change of legal entity when the accredited institution will operate through a different corporation or organization
- Addition of a new credential level, such as moving from certificate-level education into associate, bachelor's, master's, doctoral, or another materially different level
- Addition of a significant new field of study that materially changes the institution's educational scope
- Addition of a branch, additional instructional location, or significant new geographic operating location
- Material change from primarily campus-based to primarily online/distance delivery, or the reverse
- Major expansion into new countries, states, provinces, territories, or jurisdictions where legal authority must be separately evaluated
- Closure of the institution, closure of a major location, or discontinuance of a substantial portion of its educational offerings
- A teach-out, transfer, or records-custody arrangement associated with closure or discontinuance

5. Changes That Require Prompt Notification and May Require Approval

- Change of institutional legal name or principal public name
- Change of primary institutional location or headquarters
- Change of mission that materially alters educational purpose, religious/theological identity, or learner population
- Change of chief executive officer, president, chancellor, executive director, or equivalent senior leader
- Material change in governing-board composition or governance structure
- Significant reduction or expansion in enrollment, staffing, faculty, or program volume that may affect institutional capacity
- Major change in learning management system or educational technology when continuity, security, or student access could be affected
- Material outsourcing of instruction, student services, records, technology, or other core institutional functions
- Significant financial deterioration, insolvency risk, inability to meet payroll/refund obligations, or other conditions threatening continuity
- Material litigation, regulatory action, governmental investigation, or other legal matter that could affect lawful operation or student interests
- Loss, suspension, restriction, expiration, or material modification of governmental authorization, religious exemption, degree authority, professional approval, or other required authorization
- Significant change in tuition model, refund practices, admissions model, or enrollment agreements when student obligations or protections are materially affected

6. Emergencies and Unplanned Changes

GCTEQA recognizes that some substantive changes occur unexpectedly and cannot reasonably be submitted for prior approval. In such cases, the institution should notify GCTEQA as soon as practicable and ordinarily within ten (10) business days after the institution becomes aware of the material change.

Emergency implementation does not guarantee later approval. The institution remains responsible for protecting learners, preserving records, maintaining legal authority, and minimizing disruption while GCTEQA reviews the change.

7. Changes That Are Generally Not Substantive

The following changes generally do not require substantive-change approval unless they are part of a larger material change or create a compliance concern:

- Routine course revisions within an already approved program
- Normal personnel turnover below senior executive or key governance level
- Minor website, branding, or marketing updates that do not change institutional identity or status
- Routine vendor replacement that does not materially affect instruction, data security, student services, or continuity
- Minor administrative office moves that do not change the institution's principal location or educational operations

8. Substantive Change Request Requirements

A substantive-change request should include enough information for GCTEQA to understand the proposed change, its rationale, its effect on students, and the institution's continued compliance. Depending on the change, GCTEQA may request:

- A completed Substantive Change Request Form
- Description, rationale, effective date, and implementation timeline
- Board or governing-body approval
- Updated legal formation, ownership, or governance documents
- Governmental or regulatory approvals, registrations, exemptions, or correspondence
- Updated organizational chart and leadership information
- Updated catalogs, handbooks, enrollment agreements, policies, or public disclosures
- Curriculum, program, credential-level, or faculty information
- Budget, cash-flow, financial projections, or sustainability information
- Technology, data-security, LMS, or continuity documentation
- Student communication, teach-out, refund, transfer, or records-preservation plans
- Risk analysis describing potential effect on learners and institutional quality

9. GCTEQA Review Levels

GCTEQA may determine the appropriate level of review based on the significance, risk, and complexity of the change.

Review Level	Description
Notification Only	The change is documented in the institution's accreditation record and does not require further action.
Administrative Review	Staff or authorized officials review documentation and determine whether the change is consistent with existing accreditation scope.
Focused Review	Additional reviewers, interviews, evidence, or a focused virtual/on-site review are required.
Comprehensive Review	The change is sufficiently significant that GCTEQA requires a broader review of affected standards or the institution as a whole.

10. Review Criteria

In reviewing a substantive change, GCTEQA may consider whether:

- The institution remains lawfully established and authorized
- Governance and leadership remain capable of responsible oversight
- Financial resources are sufficient to implement the change without unreasonable risk to students
- Academic quality and credential integrity will be maintained
- Faculty, staffing, technology, and student services are adequate for the changed scope
- Students received accurate and timely information
- Student records, refunds, completion pathways, and continuity are protected

- Public accreditation representations remain accurate
- The institution continues to satisfy applicable GCTEQA standards

11. Possible Decisions

- Approve the change
- Approve the change with conditions, reporting, or monitoring requirements
- Determine that the change is within existing scope and requires no further action
- Defer a decision pending additional evidence or governmental authorization
- Require a focused or comprehensive review before approval
- Deny approval when the proposed change would materially undermine compliance or exceed lawful/approved authority
- Modify the institution's accreditation scope or status when necessary
- Initiate warning, probation, show-cause, suspension, withdrawal, or other action when an unreported or implemented change creates serious noncompliance

12. Implementation Before Approval

When prior approval is required, an institution that implements the change before receiving approval does so at its own risk. GCTEQA may determine that the implemented change is outside the institution's accredited scope, require corrective action, or take other action under applicable accreditation policies.

13. Governmental Approval Remains Separate

GCTEQA approval of a substantive change does not create or replace governmental, regulatory, licensing, exemption, degree-authority, professional, immigration, financial-aid, or other legal authorization. Institutions must obtain all approvals independently required by the jurisdictions in which they operate.

14. Public Representation During Review

Until GCTEQA approves a change that affects accredited scope, the institution must not represent the proposed new location, program level, entity, branch, delivery model, or other material expansion as included within GCTEQA accreditation unless GCTEQA has expressly authorized such representation.

15. Change of Ownership or Control

A change of ownership or control receives heightened review because accreditation is awarded to a specific institution operating under a particular governance and legal structure. GCTEQA may require extensive information concerning the new controlling persons or entities, finances, governance, mission, legal authority, student protections, and continuity of operations.

- Accreditation does not automatically transfer to a purchaser, successor, affiliate, or newly formed entity.
- GCTEQA may require an eligibility determination or new accreditation application when institutional identity changes materially.
- The institution should not promise continued accreditation to purchasers, investors, or students before GCTEQA review is complete.

16. New Programs and Degree Levels

When an institution seeks to add a materially new program field or credential level, GCTEQA may evaluate curriculum, faculty qualifications, learning outcomes, assessment, legal authority, student support, technology, finances, and institutional capacity before determining whether the new offering falls within accredited scope.

17. New Locations and Distance Education

Significant new locations or major delivery-model changes may require verification of facilities, technology, student access, faculty support, data protection, legal authorization, instructional quality, and continuity. Institutions operating across jurisdictions are responsible for determining whether separate authorization is required in each jurisdiction.

18. Closure, Teach-Out and Discontinuance

An institution planning closure or significant program discontinuance must prioritize learner protection. GCTEQA may require a written closure or teach-out plan addressing:

- Student notification and communication
- Reasonable completion or transfer options
- Refunds and outstanding financial obligations
- Permanent custody and accessibility of academic records
- Faculty and staff transition responsibilities
- Website and public-status statements
- Governmental/regulatory notifications
- Final reporting to GCTEQA

19. Failure to Report a Substantive Change

Failure to report a required substantive change may result in a request for immediate information, monitoring, corrective action, warning, probation, show cause, suspension, withdrawal, or another action consistent with the seriousness and impact of the omission.

20. Fees

A substantive-change review fee may apply when stated in GCTEQA's current published fee schedule. Fees support administrative and evaluation costs and do not guarantee approval.

21. Reconsideration and Appeal

If a substantive-change decision results in an adverse accreditation action that is designated as appealable, the institution may use the applicable GCTEQA Complaints & Appeals Policy. Routine administrative requests for clarification or additional evidence are not ordinarily appealable.

22. Records and Confidentiality

GCTEQA will retain substantive-change requests, supporting evidence, communications, determinations, and related records in accordance with its records-retention and confidentiality policies. Public accreditation information may be updated when a change affects institutional status or scope.

23. Policy Interpretation

GCTEQA may determine whether a particular institutional action constitutes a substantive change and what level of review is required. Institutions are encouraged to seek guidance before implementation when there is uncertainty.

APPENDIX A - SUBSTANTIVE CHANGE REQUEST FORM

Submit one form for each major change unless GCTEQA authorizes a combined submission.

Institution Legal Name: _____

GCTEQA Institution ID (if assigned): _____

Authorized Representative: _____

Title: _____

Email / Telephone: _____

Proposed Effective Date: _____

Type of Change

[ ] Ownership / control

[ ] Legal entity

[ ] Institutional name

[ ] Primary location

[ ] Branch / additional location

[ ] Mission

[ ] Chief executive / governance

[ ] New program field

[ ] New degree / credential level

[ ] Delivery model / online education

[ ] Merger / acquisition

[ ] Financial condition

[ ] Authorization / regulatory status

[ ] Closure / teach-out

[ ] Technology / LMS / outsourced core function

[ ] Other

Description and Rationale

_____

_____

_____

_____

Effect on Students and Institutional Operations

_____

_____

_____

_____

Required / Supporting Attachments

[ ] Governing-body approval

[ ] Legal or regulatory documentation

[ ] Updated organization chart

[ ] Updated program/curriculum materials

[ ] Financial documentation

[ ] Student communication plan

[ ] Teach-out / records plan

[ ] Updated policies / catalog / website materials

[ ] Other relevant evidence

Institutional Certification

I certify that the information submitted is complete and accurate to the best of my knowledge and that the institution will comply with applicable legal requirements and GCTEQA instructions regarding implementation and public representation.

Authorized Signature: _____

Printed Name / Title: _____

Date: _____

APPENDIX B - QUICK REFERENCE: WHEN TO CONTACT GCTEQA

Timing	Examples / Guidance
Before implementation whenever practicable	Ownership/control changes; mergers; new degree levels; major new program scope; new branch/location; major delivery-model change; closure/teach-out.
Promptly when known	CEO/governance changes; significant financial distress; authorization changes; major legal/regulatory action; major technology/outsourcing changes.
After emergency/unplanned change	Notify as soon as practicable, ordinarily within 10 business days, with explanation and protective measures.
When uncertain	Contact GCTEQA before acting. Early consultation can prevent inaccurate public claims or avoidable compliance issues.

Public Substantive Change Statement

GCTEQA accreditation reflects evaluation of a particular institution and approved scope at a particular point in time. Significant institutional changes may require notification, review, monitoring, or approval to ensure that quality, legal authority, learner protection, and public transparency are preserved.

CHANGE RESPONSIBLY. PROTECT LEARNERS. PRESERVE QUALITY.

Diverse Traditions. Shared Standards. Global Excellence.

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