

Recognizing and Responding to Substantive Changes



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What is a “substantive change”?



**“A significant
modification or expansion
of the nature and scope
of an accredited institution.”**

Comprehensive Standard 3.12.1



**“The institution notifies
the Commission of changes in
accordance with the substantive
change policy
and when required seeks approval
prior to the initiation of the changes.”**

**SACSCOC policy, consistent with
federal regulations, stipulates that
substantive change includes:**



- Any change in the established **mission** or objectives of the institution
- Any change in **legal status, form of control, or ownership** of the institution
- The addition of **courses or programs that represent a significant departure**, either in content or method of delivery, from those that were offered when the institution was last evaluated

SACSCOC policy, consistent with federal regulations, stipulates that substantive change includes:



- The addition of **new courses or programs of study at a degree or credential level different from** that which is included in the institution's current accreditation or reaffirmation
- A change from **clock hours to credit hours**
- A **substantial increase in the number of clock or credit hours** awarded for successful completion of a program

SACSCOC policy, consistent with federal regulations, stipulates that substantive change includes:



- Entering a **contract with an institution or organization not eligible for Title IV funds**
- The establishment of an **additional location geographically apart from the main campus** at which the institution offers at least 50% of an educational program (degree, diploma or certificate)

SACSCOC policy, consistent with federal regulations, stipulates that substantive change includes:



- The **acquisition** of any other institution or any program or location of another institution
- The **addition of a permanent location at a site where the institution is conducting a teach-out for students of another institution**
- Agreements involving **joint or dual** academic awards

In each case, the institution must notify the Commission in advance of implementation.

Notification vs. Seeking Approval



Notification: The institution sends a letter to Dr. Wheelan to **inform** the Commission of a change. SACSCOC sends a letter in return that says, "**We accept notification of...**" (there may also be a request for additional information).

Approval: The institution sends a cover letter with a **prospectus or modified prospectus**. The documentation is reviewed, and the Commission sends a response that says, "**It was the decision of the Board to approve the [site/program] and include it in the scope of the current accreditation.**"

If you have a letter of acceptance, and approval is required, draft another letter to send with a prospectus.

Acceptance ≠ Approval

Updated Interpretation of 2.7.1 – Program Length



June 2014 Board of Trustees

Intent: Maintaining the integrity of both degree programs

60 hour Associate | 120 hour Baccalaureate | 30 hour Graduate

- ☞ A combination program should meet or exceed the credit hour thresholds in the standard for the degrees awarded (e.g., a combination baccalaureate and master's degree is a combined minimum 150 semester credit hours)
- ☞ The degree program should only allow a "substitution" or "transfer" of a maximum of one year (30 semester hours) of graduate coursework for the final year of the baccalaureate degree.

The institution provides a justification for all degrees that include fewer than the required number of semester credit hours

What is a "significant departure" from existing programs?

1. The term "significant departure" is context-dependent
2. Determined by the programs already included in the institution's approved curriculum
3. What is "significant" for one institution may not be "significant" for another institution with a different suite of programs in place, resources available, or a different mission



Are you unsure whether a program is a significant departure?



1. What other, related programs are already in place?
2. Does the new program require substantial:
 - additional faculty?
 - new courses?
 - additional library or other learning resources?
 - new equipment or facilities?
 - a different resource base?

"Significant Departure" from Approved Curriculum



Some obvious examples:

- Initiating coursework or programs at a more advanced level than currently approved
- Initiating programs at a lower level than currently approved

All of these require advance notification and approval of a prospectus or application for level change.

Significant Departure - Some Less Obvious Examples:

Expanding program offerings at the
current credential level

This **may** be a substantive change
depending on what other, related
programs are currently offered



Program Expansion at the Current Level #1



A small liberal arts college offers BA degrees
in Dance, Theatre, and Music.

The institution wants to
combine existing programs
into a BA in Performing Arts.

This is **NOT** a Significant Departure

WHY?

- All courses in the new program already exist
in other programs in the approved
curriculum.
- This is a “repackaging” of the current
curriculum.
- No notification or approval is needed



Program Expansion at a Different Degree Level #2



A 2-year technical college offers a variety
of technical certificates of credit and
Associate of Applied Science degrees.

The institution will become a 4-year
institution and begin offering
associate and bachelor level
degrees.

This IS a Significant Departure

WHY?

- The institution is not yet approved to offer baccalaureate level degree programs.
- Send an **Application for Level Change** for initial programs. **A Substantive Change Committee visit will be required.**



Program Expansion at the Current Level #3



A medium-sized public institution is approved to offer business and education bachelor degrees and certificates in several health professions.

The institution would like to add a BS in Nursing.

This IS a Significant Departure

WHY?

- This will be the institution's **first degree program in a field** (the health sciences).
- Send a **prospectus** for the new program (no notification prior to sending the prospectus).



Program Expansion at the Current Level #4



A large research university offers multiple PhD programs in the Social Sciences and the Humanities, as well as several in Business and Education.

The institution plans to add a PhD in Women's Studies.

NOT a *Significant* Departure

WHY?

- An institution that offers many doctoral degrees in a wide variety of disciplines has **demonstrated its ability to support and sustain doctoral-level programs** and an understanding of the faculty qualifications and resource issues that must be addressed.
- Most of the resources to support Women's Studies are **already available** at the institution due to related PhD programs (in Humanities departments).



Initiating Off-campus Sites or Distance Learning Programs



(including sites a student must attend to access electronically-delivered instruction)

The “**substantiveness**” of such a change depends on how extensive the course offerings are: If only a few courses are offered, amounting to **less than 25%** of the work toward a program's credits, it is **not** a substantive change. No reporting is required.

Initiating Off-campus Sites or Distance Learning Programs



If enough courses are offered that a student may earn **between 25% and 49% of a program's credits** (degree, diploma or certificate):

1. **It is a substantive change**
2. It should be reported to the Commission by a **letter of notification** that includes the complete street address of the site
3. The letter should be sent **before the 25% threshold** is reached at that site (or online)

Initiating Off-campus Sites or Distance Learning Programs



If a student will be able to earn 50% or more of a program's credits at a new off-campus site or via distance delivery (**for the first program**), the institution must:

- Submit a prospectus for the site or for distance learning at least 3 months prior to implementation

To reiterate:

**Letter of Notification at 25%,
and a Prospectus
with Cover Letter at 50%**

Repeat Performance



If a particular program has been approved to be offered *concurrently* at 3 off-campus instructional sites, an institution may submit a **modified prospectus** for the fourth and subsequent sites to offer the same program. Include the following:

- Faculty roster
- Description of discipline-specific library resources
- Description of student support services
- Description of physical resources, and
- Descriptions of courses to be offered at the site.

SACSCOC policy, in accordance with US DOE guidelines, requires that:

- Approval of an off-campus site will be for a maximum of 5 years
- A “sunset date” reference will be included in the approval letter
- Sites will be reviewed again (and possibly visited) at the institution’s next 5th year or decennial review



Once an Off-campus Instructional Site is Approved,...



- Adding *approved programs* to the site requires no reporting.
- Initiating a *new program* at the site (*when the program is new to the institution and is a significant departure from the approved curriculum*) requires approval of the program.

Distance Learning

- Once an institution has been approved to offer 50% or more of the first program’s credits through distance learning, *no additional prospectus is ever requested.*
- The addition of *approved programs* to distance offerings requires no notification.



A Word of Caution:

- Institutions often fail to notice when programs:
 - reach the **25% threshold** requiring **notification** or
 - reach the **50% threshold** requiring **approval** of the site or delivery modefor both off-campus instructional sites and distance learning
- In your institution's substantive change policy, include a process to monitor course offerings at new sites & online

SACSCOC Policies on Distance Education

Adopted in June 2010

At the time of review by the Commission, the **institution must demonstrate that the student who registers in a distance or correspondence education course or program is the same student who participates in and completes the course or program and receives the credit** by verifying the identity of a student who participates in class or coursework.

Verifying Student Identity

Some possible ways to do this might include:

- **secure login and pass code** (minimum)
- **proctored examinations**
- new technologies and practices effective in verifying student identification that are being developed



Accurate Enrollment Reporting



An institution that offers distance or correspondence education **must ensure** that it reports accurate headcount enrollment on its annual Institutional Profile submitted to the Commission.

Why Do We Have to Report New Certificate Programs?



- Any program that leads to a credential (certificate, diploma, or degree) is part of the institution's accreditation.
- If the certificate is in an area where the institution does not have a program and is significantly different from existing programs, it must be approved in advance.
- If courses for the certificate are taken from approved curriculum, no notification is required.

Verifications...



US DOE is cautious about releasing financial aid for new programs and may contact the institution for proof that a new certificate program has been approved. For all site and program verifications (US DOE, SEVIS, etc.):

Email Sarah Armstrong:

1. Identify the certificate AND its parent program, and
2. Request a letter from SACSCOC acknowledging the program



sarmstrong@sacscoc.org

Workforce Development Certificates

To be offered for their employees on-site & on short notice



Offering an approved certificate program at the work place or offering a new certificate that is a significant departure from existing programs requires:

1. Requires approval prior to implementation
2. *Modified prospectus* (faculty roster, descriptions of courses, facilities, student services & learning resources available)
3. Submit as little as a week before starting
4. Site approval is valid for five years, but only for workforce development certificate programs offered there.
5. Process is not valid for *ongoing* certificate programs

Other Types of Substantive Change



- ✓ Significant change in the length of a program (*no notification, just approval. Explain reason, document effect on student learning objectives*)
- ✓ Initiating a degree completion program (*no notification, just approval. Document comparability with other programs*)
- ✓ Relocating a main or branch campus (*requires prospectus for approval*)

Other Types of Substantive Change



Mergers, Consolidations, Change of Governance,
Ownership, Means of Control

- Require **written notice 6 months in advance** and a combined prospectus submitted by all parties
- **Must be approved by SACSCOC Board of Trustees**
- Submit 4 copies of the documentation, due **April 8, 2015** for review at June Board meeting; **September 15, 2015** for December Board meeting
- **Change must take place within 30 days of approval**

Other Types of Substantive Change

- **Relocating an approved off-campus site (not just one of several programs) within the same area (e.g., serving the same pool of students)**
- **Initiating programs or courses offered through contractual agreement or consortium with entity not certified to participate in US DOE Title IV programs**
- **Certain general education changes**



Teach-out Arrangements are required when closing...



- A **program**
- An approved off-campus instructional **site**
- A **branch** campus
- An **institution**

What is a Teach-out Plan?



A written plan developed by an institution that provides for the equitable treatment of students **if a program, an institution, or an institutional location that provides fifty percent or more of at least one program, ceases to operate before all students have completed their program of study, and may include, if required by the institution's accrediting agency, a teach-out agreement between institutions.**

Teach-out Plan: What's Required?



- **Notification** as soon as the decision is made
- Send teach-out plan at least 3 months in advance for **approval**

Plan should include:

1. **effective date of closure** (when no new students are admitted)
2. **how students, faculty & staff will be notified** of intent to close
3. **how students will be counseled** on completing studies
4. **any additional costs** to students and how students were notified of them
5. **how faculty and staff will be redeployed**
6. **include any teach-out agreement** with other institutions

Teach-out Agreement

A **written agreement between institutions** that provides for the equitable treatment of students and a reasonable opportunity for students to complete their program of study if a program, an institution, or an institutional location that provides fifty percent or more of at least one program offered, ceases to operate before all enrolled students have completed their program of study.

A teach-out agreement also requires Commission approval.

Emergency Actions

**Loss of Title IV Eligibility
Loss of State Authorization
Loss of Accreditation**

What to do:

1. **Notify SACSCOC immediately**
2. **Submit a teach-out plan with signed teach-out agreement(s) as soon as arrangements are made**



Important Points to Note:

- The **date of the letter of approval** of a substantive change is considered the date on which the change is included in the institution's accreditation
- **Extensive substantive changes** by an institution may require a comprehensive evaluation of the entire institution



Responsibility for reporting substantive changes lies with the institution.



- **President or president's designee** writes a letter of notification to the President of the Commission summarizing the proposed change.
- Commission president may accept the notification, or request additional information or a prospectus or application, as appropriate.
- Institution's president or designee must sign off on a prospectus or application (e.g., in a cover letter).

Role of the Institutional Liaison

1. Be aware of the different types of reportable changes and how and when to report them.
2. Keep the institution's leadership informed of changes that must be reported
3. Develop a working relationship with the institution's COC staff member.
4. Utilize the wealth of information (what, how, when) on our website: www.sacscoc.org.
5. **Keep accurate records of reporting!**



The screenshot shows the SACSCOC website page for 'Substantive Change'. The page title is 'What is a substantive change and how should it be handled?'. The main content area contains several bullet points and paragraphs explaining the process. A red checkmark is placed over the first bullet point, and a red arrow points to the 'Academic Resources' section in the left sidebar. The sidebar includes links for 'About the Commission', 'Accounting Standards', 'Accreditation Policies & Standards', 'Announcements & Other News', 'Appellate Information', 'Committee Resources', 'Institutional Resources', 'Meetings & Events', 'Membership Directory', 'Policies & Publications', 'Recent Changes to This Site', 'Substantive Changes', 'Links', and 'Third Party Comments'.

Writing a Letter of Notification



Be sure to include:

- What **specific change** is being proposed [new program (e.g., B.S. in Nursing), new site (with full address), merger, level change, etc.]
- Brief **description** of the change
- Anticipated **starting date** (*Note: If this is missing, the submission goes to the bottom of the stack!*)
- If a new site, the **full street address**
- If a new program, **list related, approved programs**

Developing a Prospectus



- **Keep it short** (25 pages or less, plus appendices) and to the point.
- **Narrowly focused discussion** of the program or site or aspect of the institution being changed
- **Cover all the bases:** Implementation date, faculty qualifications, learning resources, physical resources, finances, assessment
- **Submit one copy** (if the institution is on sanction, it will be reviewed by the SACSCOC Board; submit four [4] copies of everything)

Developing a Prospectus



- Provide **course descriptions** instead of syllabi for all courses.
- **Download the template**, save and edit on the computer
- Institutions may submit the documentation required by state or system office **if**:
 - **all the information COC requires is there, and**
 - **you add an index to help readers find it**
- Submit on **CD, DVD, flash drive or paper**

Note: The prospectus must be entirely self-contained; embedding links to the institution's LIVE (i.e., changable) website is not permitted.

Application for Level Change



1. **Keep it brief** (25 pages or less, plus appendices)
2. **Download the template** provided, complete, edit & save to computer
3. **Must be reviewed by the Board**
4. Submit the Application for Level Change by **April 8, 2015** for review in June, **September 15, 2015** for review in December
5. Submit **four copies of everything** (CDs, DVDs, flash drives or paper)



Faculty Roster Form
Qualifications of Full-Time and Part-Time Faculty

Name of Institution: _____
Name of Primary Department, Academic Program, or Discipline: _____
Academic Term(s) Included: _____ Date Form Completed: _____

1 NAME (F, P)	2 COURSE(S) TAUGHT Including Term, Course Number & Title, Credit Hours (U, UN, UT, G)	3 ACADEMIC DEGREES & COURSEWORK Relevant to Courses Taught, Including Institution & Major List specific graduate coursework, if needed	4 OTHER QUALIFICATIONS & COMMENTS Related to Courses Taught
Faculty teaching in the program or at the site	Courses in the program	Ph.D. in X, Institution Name M.S. in X, Institution Name 18 graduate hours in X	If in doubt, include all relevant qualifications info in this column

F, P: Full-time or Part-time; U, UN, UT, G: Developmental, Undergraduate Nontransferable, Undergraduate Transferable, Graduate

Submissions on Electronic Media



- **Label** all discs and flash drives with the institution's name and the name of the proposed change
- Place flash drives in a **sealed envelope** bearing the name of the change and the institution's name
- Enclose a **cover letter on institutional letterhead** with the name of the change, the intended starting date and any instructions for accessing the contents of the submission in paragraph one
- Mail in a **padded envelope** to prevent damage in transit



Substantive change committee visits required for institutions that:



Initiate an off-campus instructional site at which 50% or more of the credits for a program may be obtained, if any of the following applies:

- ☞ the institution has **three or fewer such sites**
- ☞ the institution has **failed to demonstrate effective oversight** of its off-campus locations
- ☞ the institution is **on sanction**
- ☞ the institution has been **accredited by SACSCOC for less than 10 years**

Substantive change committee visits required for institutions that:



- Initiate a **branch campus**
- Change **governance or ownership, means of control, legal status**
- Undergo a **merger or consolidation** with another institution
- Undergo a **level change** (to Levels II, III or V)

Helpful Hints

- **When in doubt, ask us!**
- All notifications, prospectuses and applications should be **submitted on paper, CD, DVD or flash drive**. **Do not** send them as e-mail attachments.
- **Address correspondence to Dr. Wheelan**. Please **do not** send them to your staff member.
- Be sure to include a **street address** (not just a P.O. box) for all off-campus sites
- Include the **starting date** in **all** correspondence (including follow-up materials)
- **Number your pages!**

Dear Dr. Wheelan:

Oops!

We didn't seek approval
when we were supposed
to...



What to do if you discover an
unreported substantive change:



**Notify the President of the Commission on
Colleges in writing immediately:**

- The letter must include the **original implementation date** of the change
- **For changes requiring prior approval**, send the **completed prospectus or application** as soon as possible.
- **On a first offense**, you will be asked to send four copies of the policy and procedure document the institution has developed to ensure timely reporting of substantive change in the future
- **On a subsequent offense**, you must explain why the institution's policy/procedure did not work and what changes will be made; the SACSCOC Board reviews, and sanction is possible

2013 Changes to SACSCOC Substantive Change Policy



Please **DO NOT** send a letter of notification if:

1. Adding **approved** programs (significantly different or not) to an approved off-campus site.
2. Adding **approved** programs to the institution's electronic delivery offerings (*if institution is already approved for distance learning*).
3. Adding **approved** correspondence courses/ programs that are different from those initially approved for delivery via correspondence.

Continued →

2013 Changes to SACSCOC Substantive Change Policy



Please **DO NOT** send a letter of notification if:

4. Initiating **articulation agreements** with other institutions, **clinical agreements**, or **internship agreements**.

Continued →

2013 Changes to SACSCOC Substantive Change Policy

Please **DO NOT** send a letter of notification in advance of submitting the following:

1. **Application for Level Change**
2. **Prospectus** for 50% or more of a program at an off-campus site (**for approval of the site**), or
3. **Prospectus** for 50% or more of the **first** program to be delivered electronically

Continued ➡

2013 Changes to SACSCOC Substantive Change Policy

Please **DO** send a letter of notification for:

1. **Expansion at the current level** – adding new programs (*only if significant departure*).
2. Initiating a **new off-campus site** where 25-49% of a program's credits can be earned (include street address).
3. Offering (**for the first time**) at least 25% of a program's credits via **electronic delivery**.

Continued ➡

2013 Changes to SACSCOC Substantive Change Policy



Please **DO** send a letter of notification for:

4. **Moving/relocating** an approved instructional site (all programs) to serve the same pool of students.
5. Initiating programs/courses delivered through **contractual agreement or consortium**. (*Not articulation agreements.*)
6. Entering **contract with non-US DOE Title IV entity** if it offers less than 25% of a program (*If more, a prospectus will be required instead.*)

Continued ➡

2013 Changes to SACSCOC Substantive Change Policy



Please **DO** send a letter of notification in advance of submissions for:

7. **Repackaging** existing approved curriculum to create program at new degree level (See the Note regarding "repackaging" for lower level)
8. Initiating a **merger/consolidation, change of governance/means of control**

How to Reach Us

Dr. Sarah Armstrong – sarmstrong@sacscoc.org

Dr. Kevin Sightler – ksightler@sacscoc.org

404-679-4501



We're happy to answer your questions!



Joint/Dual Degree Programs

**Agreements Involving Joint and
Dual Academic Awards:
Policy and Procedures**

(approved December 2012)



Previously called:
"Collaborative Academic Arrangements"