

Recognizing and Reporting
Substantive Change


Regents Administrative Committee on
Institutional Effectiveness
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Macon, GA

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POT-SHOTS — Brilliant Thoughts in 17 words or less

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**EVERYTHING
IS CONSTANTLY
CHANGING,
IN ACCORDANCE
WITH CERTAIN
GREAT LAWS
OF THE
UNIVERSE,
WHICH
NEVER
CHANGE.**

Ashleigh Brilliant

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What is “substantive change”?

a significant
modification or
expansion of the
nature and scope of an
accredited institution.

Federal regulations stipulate that, *at minimum*, 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

Federal regulations stipulate that, at minimum, substantive change includes

- 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

Federal regulations stipulate that, at minimum, substantive change includes

- The establishment of an additional location geographically apart from the main campus at which the institution offers at least 50 percent of an educational program.
- The addition of courses or programs at a degree or credential level above that which is included in the institution's current accreditation or reaffirmation.

Why does COC care so much about it?

It is important for the Commission to understand how your institution is evolving and growing by

- Reviewing proposed changes in terms of the institutional mission
- Considering the impact of change on existing programs
- Determining whether the institution has sufficient resources to implement the change
- Evaluating the soundness of the proposed change

Why should institutions care about reporting substantive change?

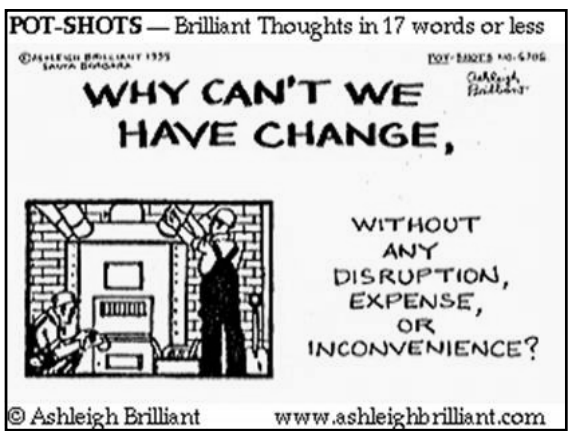
- Maintaining communication with the Commission about your programs helps to create and sustain our partnership in fostering academic quality.
- Reporting substantive changes in a timely fashion ensures compliance with federal regulations and with CS 3.12.1

And if those reasons aren't enough:

- It is important for your institution to report changes in program, since federal dollars for student financial aid are tied to approval of substantive changes.

Comprehensive Standard 3.12.1
(approved December, 2006)

“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.”



Revisions of COC policy on substantive change approved June, 2009:

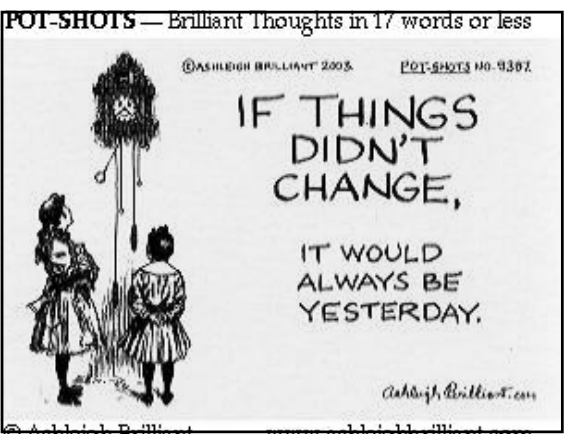
- Includes definitions of key terms
- Expanded reference table of types of changes & documentation needed
- Expanded descriptions of changes with examples under each procedure
- Streamlined procedure for certificate programs
- Downloadable Application and Prospectus forms; may be submitted on CD or DVD

What is a “significant departure” from existing programs?

- The term “significant departure” is context-dependent.
- Determined by the programs already included in the institution’s approved curriculum
- What is “significant” for one institution may not be “significant” for another institution with a different suite of programs in place or a different mission

Some questions to ask if you’re not sure if a program is a significant departure:

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



“Significant departure” from existing programs

Some obvious examples:

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

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

Expansion at current level: example 1

- A medium-sized public institution is approved to offer master’s degrees, and currently offers an MBA and an MAT. They offer a BA in communications, and would like to add an MA in communications.

Is this a substantive change?

Yes.

- An MA in Communications is very different from either an MBA or an MAT, and requires different resources.
- The level of instruction, research and learning resources necessary to support master's level training is much higher than for a bachelor's degree.

Expansion at current level: Example 2

- A large research university offers multiple doctoral degrees, including medicine, law, education, and a variety of PhD programs in sciences and humanities. They want to add a PhD program in Women's Studies.

Not a substantive change

- 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 (e.g. in Humanities departments).

Initiating off-campus sites or distance learning programs

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

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), it is a substantive change that should be reported to the Commission by a letter of notification before the 25% threshold is reached at that site.

Initiating off-campus sites or distance learning programs

- If a student may earn 50% or more of a program’s credits at the off-campus site or via distance delivery, the institution must notify the Commission at least 6 months in advance and submit a prospectus for the site or for distance learning at least 3 months ahead for approval.

If a particular program has been approved to be offered at 3 off-campus instructional sites

An institution may submit a **modified prospectus** for the fourth and subsequent sites to offer the same program:

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

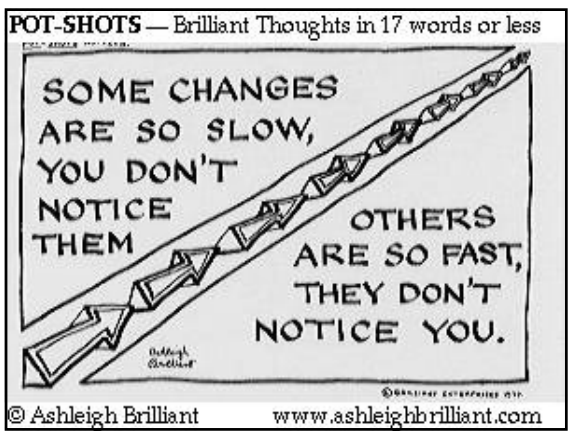
Once an **off-campus site** is approved

- Programs significantly different from those originally approved at the off-campus site may be added at the new site as long as they are already approved at the main campus. The Commission should be notified in advance of such additions.

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.**

For the addition of significantly different programs to the list of distance offerings, a letter of notification should be submitted *before* the programs are offered.



A word of caution:

Institutions often fail to notice when they have reached the 25% threshold requiring notification or the 50% threshold requiring submission of a prospectus for either off-campus instruction or distance learning.

Why do we have to report new certificate programs?

- Any program that leads to a credential (certificate, diploma, degree) is part of the institution's accreditation.
- If the certificate is in an area where the institution does not currently have a program or is significantly different from existing programs, it must be reported.
- If the courses for the certificate are taken from the approved curriculum, you do not need to notify the Commission.

Certificate programs such as workforce development certificates are often needed on short notice.

Offering an approved certificate at a new off-campus site or offering a new certificate that is a significant departure from existing programs

- Approval needed prior to implementation, but waive 6 months notice and 3 month submission
- **Abbreviated** prospectus (faculty roster, course descriptions, facilities and learning resources available)
- Submit as little as a week before starting

Other types of substantive change

Mergers and consolidations

Merger: One institution acquires the assets of another

Consolidation: two or more institutions combine assets to form a new entity

- Require written notice 6 months in advance and a combined prospectus submitted by all parties.
- Due **April 15** for June Commission meeting;
October 1 for December Commission meeting

Other types of substantive change

- Relocating an approved off-campus site
- Initiating programs or courses offered through contractual agreement or consortium
- Closing a program or institution

In each case, the institution must notify the Commission *in advance* of implementation. Typically, a prospectus is not required, although supporting documentation may be requested.

Other types of substantive change

- Altering significantly the mission of the institution
- Changing governance, ownership, control or legal status
- Significant change in the length of a program
- Initiating a degree completion program
- Relocating a main or branch campus

Each requires written notice 6 months in advance, documentation, and prior approval

Responsibility for reporting substantive changes lies with the institution.


- President or *designee* (**New!**) writes letter of notification to the President of the Commission summarizing proposed change
- Commission president may approve change, or request additional information or a prospectus or application, as appropriate.
- President or designee must sign off on the prospectus or application.

Role of the Institutional Liaison

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

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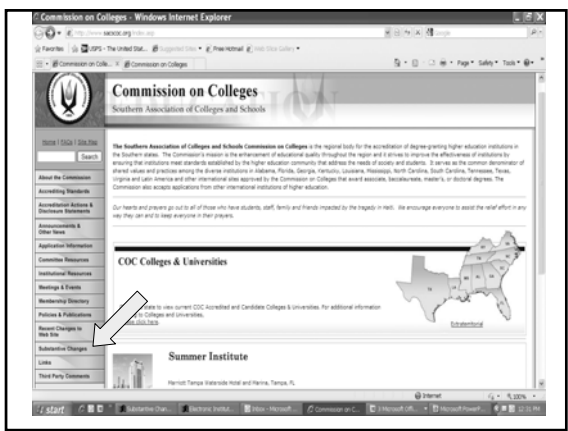
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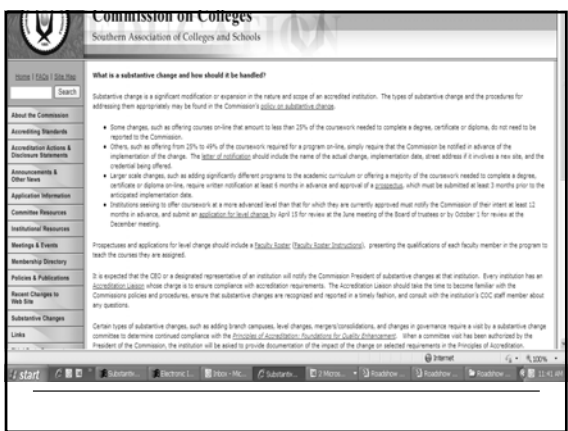


**CHANGE
WOULD BE
EASIER
TO ACCEPT,
IF
IT WERE ALWAYS
GENTLE AND POLITE.**

Ashleigh Brilliant

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The letter of notification

Be sure to include:

- What specific change is being proposed (new program, new site, merger, level change, etc.)
- Brief description of change
- Anticipated starting date
- If a new site, the 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 to be reviewed by the Board, submit 4 copies)

New!

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

Application for Level Change

- Keep it brief (50 pages or less, plus appendices)
-  Download the template provided, complete, edit & save to computer
- Must be reviewed by the Board
- Notify the Board of intention 12 months in advance; submit application April 15 for review in June, October 1 for review in December
- Submit **four** copies (CD, DVD, flashdrive or paper)

Any package should be accompanied by a cover letter.

- On institutional letterhead
- Describe what is in the package – including the name of the change and the expected starting date
- For digital submissions, include any instructions on how to access the contents

For digital submissions:

- Label the disk or flash drive with the name of your institution and the name of the change being submitted
- Flash drives should be enclosed in a sealed envelope with the name of the institution, the name of the change, and the starting date written on the outside

Substantive change committee visits are required for institutions that

- Initiate an off-campus instructional site at which 50% or more of the credits for a program may be obtained (for the first three such sites)
- Initiate a branch campus
- Change governance or ownership, with a change in control
- Undergo a merger or consolidation with another institution
- Undergo a level change

If a committee visit is authorized

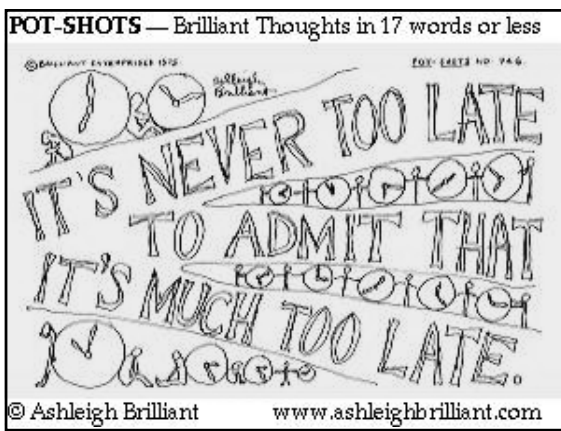
- Committee will visit campus within 6 months after implementation of the change
- Institution must submit "Documentation for the Substantive Change Committee" – a narrowly focused "mini Compliance Report" describing the impact of the change on selected aspects of the *Principles of Accreditation* (see templates on website).

A Substantive Change Committee

- has a clearly-defined focus: to review the change and determine its impact on the institution's accreditation
- May be quite small (two or three evaluators)
- Is selected for expertise in the area(s) affected by the change
- Is tightly focused – the visit is usually quite short

Helpful Hints

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



Dear Dr. Wheelan:

Oops!

We didn't notify the Commission 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 of notification must include the date of the original implementation of the change.
- For changes requiring prior approval, send the completed prospectus or application as soon as possible

How to reach us:

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I'll be happy to answer your questions!



The logo is circular with a serrated edge. Inside the circle, there is a stylized torch with a flame. The text 'SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS' is written around the inner border, and the year '1895' is at the bottom.
