


Recognizing and Reporting Substantive Change
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Agenda:

- Goals of the workshop
- Background
- Types of substantive change
- Your questions

Goals of today's discussion:

- Ensure a mutual understanding of the various types of substantive change
- Respond to your questions
- Listen to your thoughtful suggestions for improvement
- Enhance the partnership between your institution and the Commission

What is accreditation?

- Voluntary and self-regulatory among institutions of higher learning
- Peer review process
- Fosters public confidence in higher education
- Maintains educational standards
- Enhances institutional effectiveness
- Ensures compliance with a common set of standards

The Principles of Accreditation: Foundations for Quality Enhancement are the standards by which institutions are evaluated.

- Developed by committees of peers (faculty, staff, administration at institutions like yours)
- Approved by the Commission on Colleges - a body made up of college presidents representing member institutions in all 11 states.
- First approved December, 2001 and revised in 2006 and 2007

There are 6 regional accrediting agencies for institutions of higher education in the United States



The Southern Association of Colleges and Schools – Commission on Colleges

- Covers 11 states and Latin America
- About 800 institutions
- Community and technical colleges
- 4-year liberal arts and comprehensive
- Graduate and professional institutions
- Public, private and for-profit

All of those institutions have agreed to abide by the standards embodied in the Commission on Colleges' *Principles of Accreditation: Foundations for Quality Enhancement*.

As a regional accrediting agency, the SACS Commission on Colleges is bound by Department of Education regulations, including their regulations on substantive change.

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

- 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.
- A change from clock hours to credit hours

Federal regulations stipulate that, at minimum, substantive change includes

- A substantial increase in the number of clock or credit hours awarded for successful completion of a program
- 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.

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."

This is not a new concept!

- The policy on substantive change has been in place a long time.
- What *is* new is the inclusion of a separate item in the Comprehensive Standards referring specifically to reporting substantive changes.

CS 3.12.1 is meant to help institutions remain in compliance with federal standards.

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.

What is a "significant departure" from existing programs?

Does the new program require

- Additional faculty?
- New courses?
- Additional library or other learning resources?
- New equipment or facilities?
- New funding?

“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

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

- 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

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

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 the addition of such programs.

Distance Learning

Distance learning is instruction carried out when the instructor and students are not in physical proximity, such as on-line classes, video classes or satellite transmission.

Distance Learning

- If 50% or more of a program's credits can be obtained by some form of distance learning, the institution must notify the Commission 6 months in advance and provide a prospectus for approval at least 3 months in advance of offering the first program. This applies to the first distance learning program approved.

Distance Learning

- If a student may earn at least 25% but less than 50% of a program's credits through distance learning, the institution must notify the Commission before offering the courses.
- If less than 25% of the credits are offered via distance learning, there is no requirement to notify the Commission.

Distance Learning

Once an institution has been approved to offer distance learning, only the following need be reported:

- The addition of significantly different programs to the list of offerings
- Introduction of new modes of delivery

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.

Less common 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. See policy for submission dates.

Less common types of substantive change

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

In both cases, the institution must notify the Commission in advance of implementation. Typically, a prospectus is not required.

Less common 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
- Closing an institution or program

Each requires written notice 6 months in advance and prior approval

Pop quiz!

“We have a business program and will be adding a culinary arts program in that division. Is this a substantive change?”

Yes.

“We have an AAS program in Automotive Body Repair, and will be adding a certificate in the same subject. Must we report this?”

No.

“We notified COC several years ago of an off-campus site at which 40% of an associate’s degree could be earned. Now it seems that enough courses are offered there to allow a student to earn 50% of a degree, although that was not our intention. Do we have to report it?”

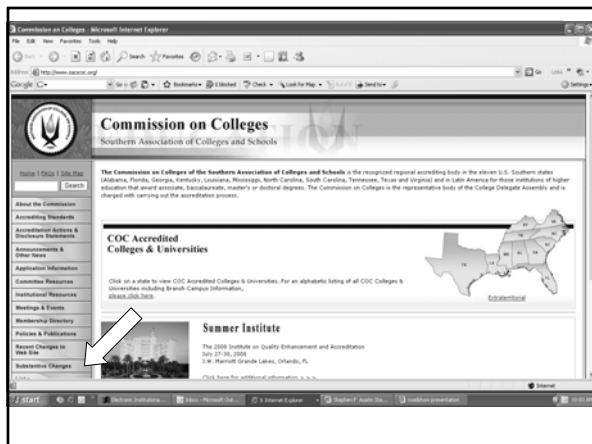
Yes.

Responsibility for reporting substantive changes lies with the institution.

- President or CEO of institution 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 of institution 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.





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: faculty qualifications, learning resources, physical resources, finances, assessment
- Submit one copy

Preparing an Application for Level Change

- Keep it brief (50 pages or less, plus appendices)
- Use the template provided
- Submit four copies
- Must be reviewed by the Commission
- Notify the Commission of intention 12 months in advance; submit application 9 months in advance of planned implementation

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 of 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.

The Committee

- 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!
- All notifications, prospectuses and applications should be submitted on paper – not by e-mail - to Dr. Wheelan.
- 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
- Number your pages!

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We'll be happy to answer your questions!