

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

"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:

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- 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 <u>different</u> <u>from</u> 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* <u>and</u> *approval* of a prospectus or application for level change.

# Significant Departure - Some Less Obvious Examples:

Expanding program offerings at the current credential level

This <u>may</u> be a substantive change depending on what other, related programs are currently offered



# Program Expansion at the Current Level #1

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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

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(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
- It should be reported to the Commission by a letter of notification that includes the complete street address of the site
- The letter should be sent <u>before</u> 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 <u>first program</u>*), 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 5<sup>th</sup> year or decennial review

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



- Adding approved programs to the site requires no reporting.
- Initiating a <u>new program</u> at the site (when the program is new to the institution <u>and</u> 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 <u>approved programs</u> 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 mode

for 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**

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An institution that offers distance or correspondence education <u>must</u> 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
- 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
- Modified prospectus (faculty roster, descriptions of courses, facilities, student services & learning resources available)
- 3. Submit as little as a week before starting
- 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

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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
- 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

- 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!





#### Writing a Letter of Notification

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#### 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)

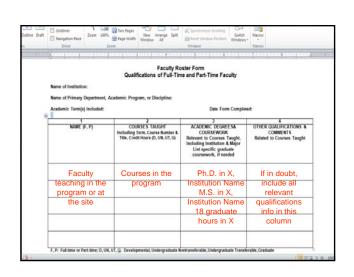
#### Developing a Prospectus



- 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.





#### 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 <u>any</u> of the following applies:

- s the institution has three or fewer such sites
- the institution has failed to demonstrate effective oversight of its off-campus locations
- s the institution is on sanction
- cs 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. <u>Do</u> <u>not</u> 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 <u>all</u> correspondence (including follow-up materials)
- Number your pages!

Dear Dr. Wheelan:
Oops!
We didn't seek approval
when we were supposed
to...



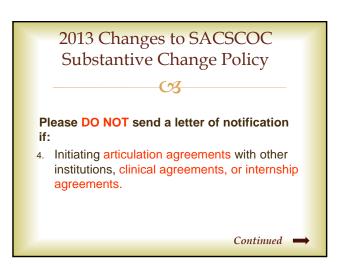
2013 Changes to SACSCOC
Substantive Change Policy

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.



# 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 <u>first</u> program to be delivered electronically

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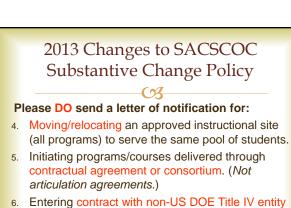
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# 2013 Changes to SACSCOC Substantive Change Policy

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

- 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).
- Offering (for the first time) at least 25% of a program's credits via electronic delivery.

Continued =



if it offers less than 25% of a program (If more, a

prospectus will be required instead.)

# 2013 Changes to SACSCOC Substantive Change Policy C3 Please DO send a letter of notification in advance of submissions for:

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





