

Recognizing and Responding to Substantive Changes

Sarah L. Armstrong, Ph.D.
Director of Institutional Support

Summer Institute for Quality Enhancement
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What's **new** in the world of substantive change?

- Changes in USDOE language (Federal Register, part 602.22)
 - Contractual arrangements
 - Off-campus site approvals
 - Teach-out arrangements
 - Distance and correspondence education

Changes to SACSCOC Substantive Change policy

- Added Glossary of Terms
- Made Mergers and Consolidations (old Procedure 3) a separate policy to include mergers, consolidations, change of ownership, governance, legal status or form of control
- New expectations for teach-outs (becomes the new Procedure 3)
- Expanded definition of substantive change and resulting operational changes
- **Require institutions to have policy and procedure for reporting substantive 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:

- 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
- ★ Entering into a contract with an institution or organization not eligible for Title IV funds

SACSCOC policy, consistent with federal regulations, stipulates that 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 of study at a degree or credential level different from that which is included in the institution's current accreditation or reaffirmation.

SACSCOC policy, consistent with federal regulations, stipulates that substantive changes include:



The acquisition of any other institution or any program or location of another institution



The addition of a permanent location at a site at which the institution is conducting a teach-out for students of another institution

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

“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

**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

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 (*for the first such program*), 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 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:

- 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

 **SACSCOC policy, in accordance with DOE guidelines, requires that**

- Approval of off-campus sites will be for a maximum of 5 years.
- A sunset date will be included in the approval letter
- The sites will be reviewed again at the next 5th year or decennial review

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.
- Adding approved programs to a site, when those programs are not significantly different, requires no reporting.

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 programs that are already approved but are significantly different from existing distance offerings, a letter of notification should be submitted *before* the programs are offered.

Institutions must verify the identity of students enrolled in distance or correspondence courses

Examples of ways to do this:

- a secure login and pass code
- proctored examinations
- other technologies and practices that are effective in verifying student identification.

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 approved in advance.
- If the courses for the certificate are taken from the approved curriculum, you do not need to notify the Commission.

However...

- US-DOE is cautious about releasing financial aid for new programs
- They may contact you for proof that a new certificate program has been approved
- Contact the Substantive Change office, verify the program, and request a letter from SACSCOC acknowledging the program

Employers often request that a certificate program be offered for their employees on short notice.

- Offering an approved certificate at the work place or offering a new certificate that is a significant departure from existing programs
- Approval prior to implementation
- Modified prospectus (faculty roster, course descriptions, facilities and learning resources available)
- Submit as little as a week before starting

Other types of substantive change

Mergers, consolidations, change of governance, ownership, means of control
(see new policy document for content of prospectus)

- Require written notice 6 months in advance and a combined prospectus submitted by all parties.
- Must be approved by SACSCOC Board of Trustees
- Due **April 15** for review at June Board meeting;
September 15 for December Board meeting

Other types of substantive change

- Relocating an approved off-campus site within the same area
- 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.



Teach-out arrangements are required when closing

- a program
- approved off-campus instructional site
- branch campus
- institution

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.

Closing a program, site, branch or institution requires a teach-out plan:

- Notification in advance, once decision is made to close
- Submit teach-out plan in advance for approval
 - effective date of closure (no new students admitted)
 - how students, faculty & staff will be notified of intent to close
 - how students will be counseled on completing studies
 - additional costs to students and how students will be notified of them
 - how faculty and staff will be redeployed
 - 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. Such a teach-out agreement requires Commission approval.

Emergency actions

Loss of Title IV eligibility
Loss of state authorization
Loss of accreditation

- Notify SACSCOC immediately
- Submit teach-out plan with teach-out agreement(s) as soon as arrangements are made

Other types of substantive change

- 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. See text of the Substantive Change Policy for specifics of each.



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

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!

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** and **list other approved sites**
- 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)

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

Prospectuses that require Board of Trustees review:

- a proposed substantive change requiring prior approval submitted by an institution currently on sanction
- a proposed substantive change submitted by an institution recently removed from sanction with particular attention to those involving non-compliance with Core Requirement 2.11.1 or Comprehensive Standard 3.10.1, both dealing with financial health
- a proposed substantive change submitted by an institution currently on reimbursement for Title IV federal funding
- the prospectus of an institution planning a merger/consolidation, change of legal status, governance, ownership or form of control.

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, September 15 for review in December
- Submit **four** copies (CD, DVD, flash drive or paper)

Submissions on electronic media

- Label all discs and flash drives with the name of the proposed change and the institution's name
- 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
- Mail in a padded envelope so the device is not damaged in transit

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, 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 are 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 (or to me!)
- Be sure to submit 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 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:

Dr. Sarah Armstrong
sarmstrong@sacscoc.org
404-679-4501 ext. 4571

Dr. Ralph Russell
rrussell@sacscoc.org

I'll be happy to answer your questions!


