Accreditation through Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)

What is a Substantive Change?
What is a *Substantive Change*?

“*A significant modification or expansion of the nature and scope of an accredited institution.*”
SACSCOC POLICY, Consistent With Federal Regulations, Stipulates That Substantive Change Includes:

1. Any change in the established mission or objectives of the institution.

2. Any change in legal status, form of control, or ownership of the institution.

3. 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.
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4. A substantial increase in the number of clock or credit hours awarded for successful completion of a program.

5. Entering a contract with an institution or organization not eligible for Title IV funds (requires notification and/or prospectus depending on percentage of program being offered).

6. The establishment of an additional location geographically apart from the main campus at which the institution offers at least 25% of an educational program (degree, diploma or certificate).
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7. 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.

8. Moving/relocating an approved instructional site to serve the same pool of students.

9. Initiating programs/courses delivered through contractual agreement or consortium (including early college high school and dual enrollment programs offered at the high school).
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**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.”

**Notification:** The College sends a letter to the President of SACSCOC 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 that requires approval).

**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, “We approve…”
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What Is A “Significant Departure” From Existing Programs?

- The term “significant departure” is context-dependent.

- This is 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.
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- 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?
  - a different resource base?
Some obvious examples include:

- 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.

- Expanding program offerings at the current credential level.

This may be a substantive change...depending on what other, related programs are currently offered.
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Example #1: Program Expansion At The Current Level

- A community college has offered extensive Applied Science programs in building trades, business, and automotive areas, as well as general AA and AS programs for transfer to 4-year institutions.
- The institution plans to add an AAS in Nursing program.
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WHY would this be a substantive change?

- The institution does not offer any other programs in health-related disciplines.

- Thus, they would have to hire new faculty, expand their library holdings, possibly create new facilities and purchase additional equipment.
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Example #2: Program Expansion At The Current Level

- A small liberal arts college offers a range of programs in humanities, natural science, social science and mathematics.
- The institution plans to add a multidisciplinary program in Environmental Studies.
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WHY is this probably not a significant departure?

- Relevant courses most likely already exist in the areas of biology, chemistry, sociology, political science and other related fields.

- By drawing on existing courses, and perhaps adding a few new ones, the institution could launch such a program with very few or even no new resources.
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Example #3: Program Expansion At The Current Level

- A medium-sized public institution is approved to offer master’s degrees, and currently offers an MPA and an MAT.
- They offer a BA in Communications, and would like to add an MA in Communications.
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WHY would this be a substantive change?

- An MA in Communications is very different from either an MPA 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.
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**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.
  - It should be reported to the Commission by a letter of notification that includes the street address.
  - The letter should be sent before the 25% threshold is reached at that site.
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- 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:
  
  *Submit a prospectus for the site or for distance learning at least 3 months ahead for approval.*

**To reiterate:** Letter of Notification at 25%, and a Prospectus with Cover Letter at 50%.
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- Approval of an off-campus site will be for a maximum of 5 years.
- The sites will be reviewed again at the next 5th year or decennial review.
- Initiating a new program at the site (program is new to the institution) requires approval of the program.
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A WORD OF CAUTION…Institutions often fail to notice when their programs have:

- reached the **25% threshold** requiring notification or
- reached the **50% threshold** requiring approval of the site or delivery mode for both off-campus instruction or distance learning.
SACSCOC Policies On Distance Education (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.
Do We Have To Report New Certificate Programs? Yes.

- 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 or is significantly different from existing programs, it must be approved in advance.
- However, 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.
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If an Employer Requests A Workforce Development Certificate Program For Their Employees…

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

- Approval prior to implementation.
- Modified prospectus (faculty roster, course descriptions, facilities, student services and learning resources available).
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OTHER Types Of Change That Must Be Reported:

- Mergers, Consolidations, Change of Governance, Ownership, Means of Control
  - Requires written notice 6 months in advance and a combined prospectus submitted by all parties.
  - Must be approved by SACSCOC Board of Trustees.
  - Requires 4 copies of the documentation, due April 15 for review at June Board meeting; September 15 for December Board meeting.
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- Relocating an approved off-campus site 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 USDOE Title IV programs.
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- Closings that Require Teach-out Arrangements…
  - A program.
  - An approved off-campus instructional site.
  - A branch campus.
  - An institution.
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Teach-Out Plan Must be Approved and Include:

- Notification as soon as the decision is made.
  - Effective date of closure (no new students admitted).
  - How students, faculty and staff will be notified of intent to close.
  - How students will be counseled on completing studies.
  - Additional costs to students and how students were notified of them.
  - How faculty and staff will be redeployed.
  - Any teach-out agreement with other institutions.

- Plan must be submitted at least three months in advance for approval.
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IMPORTANT POINTS TO NOTE:

- All communication with SACSCOC should be coordinated through the SACSCOC Liaison (Divya Bhati).
- Extensive substantive changes by an institution may require a comprehensive evaluation of the entire institution.
- The date of the letter of approval from SACSCOC is considered the date on which the change is included in the institution’s accreditation.
College of Charleston
SACSCOC Liaison

For more information, please contact:

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