Waltzing Through Substantive Change

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The Basics

• Substantive change is a significant modification or expansion of the nature and scope of an accredited institution.

• 13 different “triggers” for substantive change included in the SACSCOC Substantive Change Policy. (Located on SACSCOC website, www.sacscoc.org)

• The policy delineates three procedures, requiring various degrees of prior notification and/or approval.

13 Triggers

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.
4) 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.

5) A change from clock hours to credit hours.
6) A substantial increase in the number of clock or credit hours awarded for successful completion of a program.
7) The establishment of an additional location geographically apart from the main campus at which the institution offers at least 50% of an educational program.
8) The establishment of a branch campus.
9) Closing a program, off-campus site, branch campus or institution.
10) Entering into a collaborative academic arrangement that includes only the initiation of a dual or joint academic program with another institution.
13 Triggers

11) Acquiring another institution or a program or location of another institution

12) Adding a permanent location at a site where the institution is conducting a teach-out program for a closed institution

13) Entering into a contract by which an entity not eligible for Title IV funding offers 25% or more of one or more of the accredited institution’s programs.

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7) The establishment of an additional location geographically apart from the main campus at which the institution offers at least 50% of an educational program

8) The establishment of a branch campus

9) Closing a program, off-campus site, branch campus or institution

10) Entering into a collaborative academic arrangement that includes only the initiation of a dual or joint academic program with another institution.
The Big 5

1. 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.

2. 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.

3. The establishment of an additional location geographically apart from the main campus at which the institution offers at least 50% of an educational program.

4. The establishment of a branch campus.

5. Closing a program, off-campus site, branch campus or institution.

So, what is "significant"?

"Different" means up or down.
The Big 5

3. The establishment of an additional location geographically apart from the main campus at which the institution offers at least 50% of an educational program. Not a 25-mile radius. ANY site at which 50% or more of a program is offered.

The Big 5

4) The establishment of a branch campus

The Big 5

5) Closing a program, off-campus site, branch campus or institution. Very easy to overlook.
5 Changes that trigger a site visit

1) The initiation of an additional off-campus site/location at which a student can earn at least 50% of the credit toward an educational program
2) The initiation of a branch campus
3) The initiation of a change in governance/ownership with a change in control
4) The initiation of mergers/consolidations
5) The initiation of coursework, credit certificates, or degree programs at a different level than currently approved by SACSCOC

Section II: The Substantive Change Prospectus

The Prospectus
- Submit by paper, flash drive, CD, or DVD, but not by email
- Prospectus should be “concisely worded”
- Tailor the prospectus to focus on the specific change
The Prospectus

Cover sheet(s) include:

- Contact info for SACSCOC liaison
- List of degrees and majors currently offered
- List of programs related to the one proposed
- Summary of institutional strengths related to proposed program
- List of existing approved off-campus sites

(1) Abstract
-- one page or less
-- big picture view

(2) Background information
-- story of the change
-- tell it, sell it

(3) Assessment of need, planning, approval
-- demonstrate need
-- outside parties review and approval

(4) Description of the change
-- describe change
-- see instructions for specific data

(5) Faculty
-- SACSCOC faculty roster form
-- CVs aren’t enough

(6) Library and learning resources
-- demonstrate you know what’s need
-- show plan for adding resources/access
The Prospectus

(7) Student support services
   -- cover delivery of all services

(8) Physical resources
   -- impact on existing programs and services
   -- needs for new program

(9) Financial support
   -- business plan and first-year budget
   -- contingency plan

The Prospectus

(10) Evaluation and assessment
    -- incorporate new program into IE
    -- compare alternative formats to traditional

(11) Appendices
    -- in addition to the 25 page maximum
    -- agreements, documents cited in prospectus

Section III: The Substantive Change Visit
10 Tips for a Successful Visit
1) Employ the services of an external reviewer(s)
2) Prep key members of the faculty and staff (and students) to present the institution in the best possible light.
3) Anticipate questions related to areas that are frequently troublesome to SC petitioners:
   a. Faculty
   b. Library and Learning Resources
   c. Finances
   d. Institutional Effectiveness
4) Many interviewees will be predictable (i.e., VPAA, program director, faculty in proposed program, IR&E director, CFO, library director, etc.). Ensure they are prepared for the interviews and well versed in factual information.
5) Be prepared to use every opportunity to make your case for compliance, starting with opening meeting with campus leadership team.
6) Understand that while the Substantive Change Committee is there to review a specific area, findings of other instances of non-compliance with the Principles of Accreditation may occur.
7) Coach campus personnel to understand that reviewers are not evaluating the “merit” of the change; rather, they are evaluating the institution’s ability to implement the change while maintaining fidelity to the Principles of Accreditation.
10 Tips for a Successful Visit

8) Invite consultative feedback from evaluators.
9) Ensure that all appropriate campus personnel have read the Substantive Change Application/Prospectus, particularly the areas in which they are involved.
10) Remember that the committee’s report will closely follow the Application/Prospectus. Investing effort in precise, concise, information-rich narrative will move the committee toward a “verify” orientation and away from one of “discovery.”

Section IV: Substantive Change Expected

Culture of Innovation
- Don’t be afraid of substantive change
- Embrace change; expect change
- If an organization isn’t growing, it’s dying
- Substantive change is an indicator of health
Substantive Change Quiz

1. Most SACSCOC substantive change applications will trigger a site visit. [yes] [no]

2. Closing a program does not require a Substantive Change notification as long as the institution offers other degrees at the same level. [agree] [disagree]

3. A small Level II university with no health-related programs plans to initiate a nursing degree program. Will this likely require a substantive change notification? [yes] [no]

4. A large Level VI university with undergraduate programs in Biology, Chemistry, and Physics plans to create a formal Pre-Med major combining existing courses from these three programs (among others). Will this likely require a substantive change notification? [yes] [no]

5. My institution discovered an instance of unreported substantive change. Will we be automatically placed on sanction by SACSCOC? [yes] [no]

6. A large Level V institution offers doctoral degrees in other areas but plans to initiate its first doctoral program in health sciences: a Ph.D. in Nursing. Will the new program require prior notification and approval? [yes] [no]

7. A Level II community college offers complete degree programs at 13 sites within its service region. It plans to quit offering coursework at one site and simultaneously begin offering the same program at another site. Will this change require prior notification? [yes] [no]

8. My institution plans to offer dual credit instruction, totaling 24% or less of a degree program, at a local high school. Will this require prior notification/approval by SACSCOC? [yes] [no]

9. My institution plans to close a degree program, but will provide all instruction necessary to complete the degree for students currently enrolled. Will this require prior notification/approval by SACSCOC? [yes] [no]

10. [yes] [no]

11. A Level IV institution offering bachelor’s and master’s degrees plans to begin offering associate degrees. Will this require prior notification/approval by SACSCOC? [yes] [no]
Cheat Sheet

• Ensure that the Big 5 substantive change triggers are regularly discussed among key administrative personnel
• Bookmark the SACSCOC Substantive Change Policy!
• ALWAYS seek the counsel of your SACSCOC Vice President when in doubt as to whether or not a change rises to the level of being substantive.
• Pay careful attention to completing the appropriate form, Application vs. Prospectus.
• Immediately report instances of unreported substantive change. (Better if self-reported)