

SUBSTANTIVE CHANGE MANUAL

*A Publication of the Accrediting Commission
for Community and Junior Colleges
Western Association of Schools and Colleges*

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Edition

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3 Changes the Commission Considers Substantive

Below is a list of conditions which require substantive change approval in order to comply with new Higher Education Opportunity Act (HEOA) regulations [34 C.F.R. § 602.22]. Illustrations (not exhaustive) and key institutional considerations for each condition are included; key considerations suggest points upon which the institution should focus the proposal. The proposal should address all of the required elements (as described in 4.2, Step Three, “Required Format and Content of the Substantive Change Proposal”). Conditions *subject to prior substantive change review and approval by the Commission* include:

3.1 Change in Mission, Objectives, Scope, or Name of the Institution

3.1.1 A Change in the Purpose or Character of the Institution

Example:

The institution changes its private or public character, including changes in the denominational character of a religiously-affiliated institution.

Key Considerations:

- The mission statement is fundamental to determining the institution’s programs and services, its governance and decision-making processes, and its planning. An institution undertaking a change in purpose or scope would likely revise its mission statement. The resulting statement should define the institution’s broad educational purposes, its intended student population, and its commitment to achieve student learning.
- The Commission may require a comprehensive review for a change in mission.

3.1.2 A Change in the Degree Level from that which was Previously Offered by the Institution

Example:

The college offers a program at a level different from the two-year associate degree, e.g., a third year and/or upper division of a program; a four-year baccalaureate degree.

Key Considerations:

- In particular, the proposal must present evidence of the institution’s ability to provide courses consistent in quality and rigor with the Eligibility Requirements, Accreditation Standards and Commission policies.

3.1.3 Any Change in the Official Name of the Institution

Example:

An institution replaces its name with the name of its district or system.

Key Considerations:

- The proposal must present evidence that it has made proper notification of its change of name, including notifying the USDE if the institution participates in federal financial aid programs. Any change in name must be consistent with the institution's mission.

3.2 Change in the Nature of the Constituency Served

3.2.1 A Change in the Intended Student Population

Example:

An institution offers courses or programs via online delivery intended to reach students not included in the student population described in the current institutional mission statement.

Key Considerations:

- The proposal must present evidence that the college has reviewed its mission statement to determine whether the new population falls within its intended student population. A significant revision of the mission statement may be indicated.
- The institution needs to know where its Distance Education and Correspondence Education (DE/CE) students reside and if out-of-state, are there any state authorization processes or procedures that must be followed.
- The institution should also consult the *Guide to Evaluating Distance Education and Correspondence Education* for the principles that apply to good practice, and the Commission's "Policy on Distance Education and on Correspondence Education" to ensure that it continues to meet Eligibility Requirements, Accreditation Standards and Commission policies.

3.2.2 The Closure of an Institution

Example:

An institution ceases to offer all educational courses or programs.

Key Considerations:

- Institutions planning closure must follow the Commission's "Policy on Closing an Institution." In particular, the proposal must present evidence that the institution has made appropriate arrangements for students to complete their programs of study and for transfer of student records to other institutions. The institution should also make arrangements for transfer of financial aid awards.
- If an institution closes programs offered, it needs to make appropriate arrangements for students enrolled in these programs to complete their educational goals.

3.3 Change in the Location or Geographic Area Served

3.3.1 Offering Courses or Programs Outside the Geographic Region Currently Served

Example:

An institution offers and/or transports courses or programs to a new campus location outside the community described in the current institutional mission statement or outside the WASC region, including international sites.

Key Considerations:

- The evaluation of institutions that deliver education at a physical site in another region will be undertaken with the participation of the host regional accrediting commission. This will include the joint (home/host) review of off-campus sites in a host region against the Accreditation Standards of that region. Please see the Interregional Policies on the Accreditation of Institutions Operating Across Regions.
- An institution planning to establish a site outside of the United States (U.S.), designed to serve non-U.S. nationals, must follow the Commission's "Policy on Principles of Good Practice in Overseas International Education Programs for non-U.S. Nationals" and the "Policy on Contractual Relationships with non-Regionally Accredited Organizations."
- The proposal must present evidence that the institution will maintain sufficient control of the program, site, personnel, and policies to ensure continued compliance with Eligibility Requirements, Accreditation Standards, Commission policies and quality equivalent to the main campus.

3.3.2 Establishing an Additional Location Geographically Apart from the Main Campus at which the Institution offers at least 50% of an Educational Program

Examples:

An institution offers at least half of the courses required for an associate's degree or career technical education certificate at a single off-campus location. An institution transports, transfers, or duplicates at least half of the courses required for an associate's degree or career technical education certificate to a new location or site, geographically apart from the main campus, and different from or in addition to previously approved sites.

Key Considerations:

- The proposal must provide the address and present evidence of sufficient control over the site to assure the quality of programs and services.
- Students must have access to support services and learning resources appropriate to the programs offered at the location and comparable to the main campus.

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- The proposal must present evidence that the site meets Eligibility Requirements, Accreditation Standards and Commission policies for safety, security, facilities, equipment, and appropriateness for the institutional programs and services conducted at the site.
 - The institution must also demonstrate its ability and commitment to meet the fiscal requirements and sustainability of the additional location.
 - For purposes of compliance with federal recognition requirements, the Substantive Change Proposal constitutes the business plan for the establishment of a branch campus.
 - The Commission requires a visit within six months of the start of operation at the new facility to verify that the institution has the personnel, facilities, and resources reported in the Substantive Change Proposal.
 - If the substantive change is to establish an additional branch campus location, private institutions must include projected revenues and expenditures, and cash flow at a branch campus.
 - Public institutions, in keeping with the financial reporting requirements of their district, system, or governmental agency, must include financial information which allows for comparable analysis of the financial planning and management of a branch campus.

3.3.3 Closing a Location Geographically Apart from the Main Campus at which Students were able to complete at least 50% of an Educational Program

Example:

An institution closes a campus where students have been able to take at least half of the courses applicable to an associate's degree or certificate.

Key Considerations:

- Institutions planning closure of a site must follow the Commission's "Policy on Closing an Institution" in the *Accreditation Reference Handbook*. Should the college wish to reopen the site, a second Substantive Change Proposal, and visit will occur prior to reopening to verify that the institution has the personnel, facilities, and resources reported in the proposal. The proposal must present evidence of institutional quality consistent with Eligibility Requirements, Accreditation Standards and Commission policies.

New Higher Education Opportunity Act (HEOA) regulatory language requires that ACCJC/WASC accredited and candidate institutions submit a teach-out plan for approval upon occurrence of any of the following events:

- The USDE notifies the accrediting agency that it has taken an emergency action or taken action to limit, suspend, or terminate the participation of the institution in any Title IV program;
- The accrediting agency acts to withdraw, terminate or suspend the accreditation of the institution; or

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- The institution notifies the accrediting agency that the institution intends to cease operations.

The HEOA amendments stipulate that the USDE may not recognize an accrediting agency for purposes of Title IV eligibility unless the institution has submitted and received approval of the teach-out plan by the accrediting agency.

3.4 Change in the Control of the Institution

3.4.1 Any Change in the Legal Status, Form of Control, or Ownership of the Institution

The Commission requires a visit within six months of the change of status, form of control, or ownership.

Example:

Sponsorship or ownership of a private institution changes

Key Considerations:

- The Substantive Change Proposal must present evidence of the fiscal soundness of the entity acquiring or purchasing the institution. In the case of a private institution with a corporate and a governing board, the proposal must clearly state which body is responsible for policies; which body confirms that institutional practices are consistent with the board-approved institutional mission statement and policies; how these two bodies achieve these overlapping purposes; which body has ultimate authority for these operations; the president/CEO role; and how authority is vested and organized. Institutions planning this type of substantive change should refer to the Commission's "Policy on Institutions with Related Entities," in the *Accreditation Reference Handbook*.
- Institutions undergoing changes in ownership, control, and/or legal status are visited within six months of the implementation of the change to verify that the institution has the human, physical, technology and financial resources reported in the Substantive Change Proposal.

Example:

A for-profit institution becomes a non-profit institution.

Key Considerations:

- The proposal must present evidence of how the change will impact the financial stability of the institution and its ability to meet Eligibility Requirements, Accreditation Standards and Commission policies for high-quality educational programs and services.

Example:

The district/system changes provision for administrative governance or other support services to one or more colleges.

Key Considerations:

- The proposal must explain how the college(s) will address proposed changes in support services and how the proposed administrative structure will enable the college(s) to continue to meet Eligibility Requirements, Accreditation Standards and Commission policies.

3.5 The Acquisition of another Institution, or any Program or Location of another Institution

Example:

A comprehensive college assumes responsibility for the programs offered by a specialized institution.

Key Considerations:

- The proposal must present evidence that the institution has made appropriate transition arrangements for students.
- The proposal must present evidence that the college can sustain the quality of the programs and services.

3.6 Contracting for the Delivery of Courses or Programs in the Name of the Institution with a Non-regionally Accredited Organization

Example:

An institution contracts with a commercial organization for that organization to provide more than 25% of the instruction on behalf of the institution.

Key Considerations:

- Institutions planning to contract with an organization to deliver, create, or provide courses or programs in the name of the institution or district/system must follow the Commission's "Policy on Contractual Relationships with Non-Regionally Accredited Organizations." The contract must guarantee the college sufficient control to assure that the quality of the courses or programs meet all Eligibility Requirements, Accreditation Standards and Commission policies.

3.6.1 A Change by a Parent Institution of One of its Off-Campus Sites into a Separate Institution

Example:

An institution with two campuses decides to divide into two colleges, each independently capable of offering a two-year degree.

Key Considerations:

- If the change involves the formation of a separate institution from an off-campus center or branch campus, the institution must provide projected financial information for the parent institution of the proposed division. The focus of this proposal should be the anticipated impact of the change on the parent college. The new separate institution must begin the process for separate accreditation with an application for Eligibility.

3.7 Change in Courses or Programs or their Mode of Delivery that Represents a Significant Departure from Current Practice

3.7.1 Addition of a Program or Courses that Represents a Significant Departure from an Institution's Current Programs or Curriculum

Examples:

An institution offers a program in a field requiring substantial new curriculum, faculty, equipment or facilities, such as a program with a clinical component.

A specialized institution offers courses in a field requiring substantial new curriculum, faculty, equipment, or facilities.

A program offered in face-to-face format is now offered 100% online.

Key Considerations:

- Evidence supporting the need for the program should be presented in the proposal. The institution must ensure that sufficient fiscal resources are available to support the program by providing a cost-impact analysis, and that the curriculum, faculty, equipment and facilities meet Eligibility Requirements, Accreditation Standards and Commission policies. These program resources must be in place prior to submission of the Substantive Change Proposal. The college should consider the consistency between the proposed program and the institutional mission.

3.7.2 Addition of a New Degree or Career Technical Education Certificate Program that Represents a Significant Departure from an Institution's Current Programs

Example:

An institution develops a new degree or career technical education certificate program to be offered at the main campus or at any one of the approved institutional sites off campus.

Key Considerations:

- The institution must ensure that the curriculum, faculty, equipment and facilities meet Eligibility Requirements, Accreditation Standards and Commission

policies. These resources must be in place prior to submission of the Substantive Change Proposal. The proposal must include workforce and labor market data.

3.7.3 Addition of Courses that Constitute 50% or More of the Units in a Program Offered through a Mode of Distance or Electronic Delivery, or Correspondence Education

Example:

An institution offers courses that make up 50% or more of the credits required for a program through an instructional delivery that is new for the college or the program.

Key Considerations:

The institution should consult the *Guide to Evaluating Distance Education and Correspondence Education* and Commission's "Policy on Distance Education and on Correspondence Education" for appropriate guidelines.

- The college must be knowledgeable about current federal regulations related to DE/CE.
- There must be a policy that defines "regular and substantive interaction" for DE courses (34 C.F.R. § 602.3).
- The college's policy on academic freedom applies to DE/CE and is monitored.
- New HEOA regulations require institutions which offer distance education or correspondence education to have processes in place through which the institution establishes that the student who registers in a distance education or correspondence course or program is the same person who participates each time, completes the course or program and receives the academic credit.
- The requirement above will be met if the institution verifies the identity of a student who participates in class or coursework by using, at the institution's discretion, such methods as a secure log-in and password, proctored examinations, and/or new or other technologies and/or practices that are developed and effective in verifying students' identification.
- The institution must also publish to its students the policies to the effect that, in achieving these outcomes, it ensures the protection of student privacy and will notify students at the time of class registration of any charges associated with verification of student identity.

HIGHER EDUCATION OPPORTUNITY ACT DEFINITIONS

Definition of Distance Education

Distance Education means (34 C.F.R. § 602.3):

Education that uses one or more of the technologies listed in paragraphs (1) through (4) to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously. The technologies may include:

(1) the internet;

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- (2) *one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;*
 - (3) *audioconferencing; or*
 - (4) *video cassettes, DVDs, and CD-ROMs, if the cassettes, DVDs, or CD-ROMs are used in a course in conjunction with any of the technologies listed in paragraphs (1) through (3).*

Definition of Correspondence Education

Correspondence education means (34 C.F.R. § 602.3.):

- (1) *education provided through one or more courses by an institution under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor.*
- (2) *interaction between the instructor and the student is limited, is not regular and substantive, and is primarily initiated by the student.*
- (3) *correspondence courses are typically self-paced.*
- (4) *correspondence education is not distance education.*

3.8 Change in Credit Awarded

3.8.1 An Increase of 50% or More in the Number of Credit Hours Awarded or Required for the Successful Completion of a Program

Example:

An institution changes a required 20 credit hours for a particular certificate to 30 credit hours.

Key Considerations:

- The proposal should provide evidence supporting the need and benefit to students, and evidence of necessary resources.

3.8.2 Changes in Clock Hours and/or Credit Hours

Example:

An institution changes the foundation for recognition of programs or course completion from clock hours to a calculation based on the Carnegie unit.

Key Considerations:

- The institution should review the Commission's "Policy on Institutional Degrees and Credits."
- The proposal should provide evidence of positive impact for students and the institution, and evidence of necessary resources.

3.9 Any Other Significant Change

The Commission reserves the right to request reports and visits to assess the effects of any change it deems to be a significant departure from the previous reaffirmation of accreditation (“Policy on Substantive Change,” Appendix A, page 26).

These changes, because they may affect the quality, integrity, and effectiveness of the total institution, are subject to review prior to as well as subsequent to implementation. Institutions have reported loss of federal financial aid when substantive changes were not approved by regional accrediting bodies.

