



Substantive Change Manual

August 2004

ACCJC/WASC
10 Commercial Blvd.
Suite 204
Novato, CA 94949

Phone: (415) 506-0234
FAX: (415) 506-0238
E-Mail: accjc@accjc.org
Web Site: www.accjc.org

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

Table of Contents

I. Introduction: Purposes of the Manual	3
II. Principles Underlying Substantive Change	3
III. Rationale for Requiring Approval of Substantive Changes	4
IV. Changes the Commission Considers Substantive	5
1. Change in Mission, Scope, or Name of the Institution	6
2. Change in the Nature of the Constituency Served	7
3. Change in the Location or Geographical Area Served	8
4. Change in the Control of the Institution	9
V. Commission Process for Approving Substantive Changes	13
The ACCJC Annual Report	13
Determining Whether a Change is Substantive	14
Substantive Change Review	14
Preparing the Proposal	14
Timing of Proposal Submission	15
Commission Committee on Substantive Change	15
Appeal	16
Visits	16
Institutional Follow-Up	16
VI. Format and Content of the Substantive Change Proposal	17
Required Proposal Elements	17
Method of Submission	19
VII. Follow-Up Visits	19
VIII. Tips for Preparing Proposals on Selected Substantive Changes	21
A. New Campus or Additional Location	21
B. New Educational Program	22
C. New Delivery Mode	24
Appendix A: Substantive Change Policy	26
Substantive Change Approval Process	28
Appendix B: Sample Cover Page	31
Appendix C: Brief Descriptions of Policies	32

I. Introduction: Purposes of the Manual

This Substantive Change Manual is designed to assist institutions as they consider significant changes and to guide institutional reflection on the impact of these changes on the ability of the institution to continue to meet accreditation standards. The Manual is also intended to guide development of the Substantive Change Proposal, which the college produces to support Commission review of the change. In providing this information, the Commission hopes to clarify by discussion and examples the meaning, intent, and process of Substantive Change.

II. Principles Underlying Substantive Change

The following principles underlie the purpose of Substantive Change:

- ▶ *The Commission encourages change.*
The Commission promotes educational innovation and experimentation that is responsible and appropriate to institutional mission.

- ▶ *The Commission implicitly requires change to improve the institution.*
A primary purpose of accreditation is to promote institutional improvement. The accreditation standards require that institutions engage in an ongoing effort to improve their programs and services. The Commission recognizes that without application of fresh approaches to identified opportunities and problems, improvement cannot occur.

- ▶ *The Commission anticipates that institutions will respond to evidence of the need for change.*
Accreditation standards require that institutions engage in an ongoing process of evaluation, improvement, and reevaluation. Evaluation yields evidence of institutional performance that is often the stimulus for change.

- ▶ *The Commission expects institutions to undertake change responsibly.*
In order to maintain its integrity, institutions must guarantee the quality of their programs and services, even as they make changes.

-
- ▶ *The Commission, through its Substantive Change process, ensures that institutions continue to meet accreditation standards.*

The Substantive Change process requires evidence of institutional planning, resource commitment to the proposed change, and evidence that the institution's condition following the change continues to meet accreditation standards, eligibility requirements, and Commission policies.

III. Rationale for Requiring Approval of Substantive Changes

The accreditation of an institution is in part an affirmation that the institution has established conditions and procedures under which its mission and goals can be realized and that the institution can demonstrate their accomplishment. Accreditation rests on the integrity with which institutions conduct their educational endeavors and the orderly procedures they have established for improving the results of those endeavors. *Everything done in the name of the institution is covered by its accreditation.*

When the Commission accredits an institution, or reaffirms its accreditation, it acts on the basis of conditions existing at the time of the Commission's action. Because institutions are in continual processes of change, the Commission requires that changes to the institution which are substantive be evaluated and approved to ensure that they meet accreditation standards. The Substantive Change process provides the Commission a means for ensuring that when a college undertakes a change, it maintains the educational quality and integrity of its programs and services, and that the change is consistent with the institutional mission. Through the process, the quality of the institution's full operation has been reviewed and assured. When the Commission defers an action on accredited status, or places an institution on a sanction such as Warning, Probation, or Show Cause, the Commission may defer consideration of any Substantive change request until the deficiencies have been addressed and the Commission has reaffirmed accreditation.

As part of the regulations associated with the Higher Education Act of 1965 and its Amendments, the Accrediting Commission for Community and Junior Colleges and other accrediting commissions authorized by the US Secretary of Education are required to review certain types of Substantive Change. The Commission has included the following categories in the changes it considers substantive: A substantive change is a change which alters the mission, scope, or name of the institution; the nature of the constituency served; the location or geographical area served;

the control of the institution; the content of courses or programs to an extent which represents a significant departure from current curricula; the mode of delivery of a program so that courses constituting 50% or more of a program are offered at a distance or through electronic delivery; or the credit awarded to courses or programs. In all cases, Substantive Change requires *prior* Commission approval; in some cases, a visit is required to gather facts about the planned change (before a substantive change decision) or to confirm the impact of the change on the institution's ability to meet standards (after a decision). Implementing a substantive change without prior Commission approval may result in reevaluation of the college's accredited status.

The Commission encourages institutions to undertake educational innovation and responsible experimentation which is appropriate to their mission. Accreditation standards require that institutions engage in an ongoing effort to improve their programs and services. Most changes, such as adding or dropping courses, developing new concentrations that are allied with existing offerings, and changing personnel, are not substantive and fall within the nature and scope of the institution as it was last evaluated. Other changes, such as creating new programs, initiating off-campus educational activities, or offering courses through new delivery modes, may require Commission approval through the Substantive Change process. While the decision to modify an institution is an institutional prerogative and responsibility, the Commission is obligated to determine the effect of such changes on the quality, integrity, and effectiveness of the total institution.

IV. Changes the Commission Considers Substantive

The Commission's Substantive Change Policy, revised June 2002, describes what constitutes a change that is substantive and lists types of substantive changes. It describes the Substantive Change approval process and outlines the required contents of the Substantive Change Proposal. The policy can be found in Appendix A of this manual.

The following examples are meant to be illustrative and do not constitute an exhaustive list of conditions which may require a Substantive Change Proposal, hereafter called "the proposal." The proposal should address all of the required elements (A-H as described in "Preparing the Proposal" of this handbook). "Key Considerations" suggest points upon which the institution should focus the proposal. Examples

of substantive changes ***subject to prior review and approval by the Commission*** include:

1. Change in Mission, Scope, or Name of the Institution

- ▶ A change in the purpose or character of the institution.

Example:

Changing an institution's 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 process, and its planning. An institution undertaking a change in purpose or scope would be likely to revise its mission statement. The resulting statement should define the institution's broad educational purposes, its intended student population, and its commitment to achieving student learning.

- ▶ A change in the degree level from that which was previously offered by the institution.

Example:

Offering the third year of a program

Key Considerations:

In particular, the report must present evidence of the institution's ability to provide courses consistent in quality and rigor with the standards.

Example:

Offering a program at a degree level different from the two-year Associate Degree, e.g., a four-year, baccalaureate degree.

Key Considerations:

An institution planning to offer baccalaureate degrees will fall under the jurisdiction of the Accrediting Commission for Senior Colleges and Universities (ACSCU) WASC. The first step in changing from ACCJC membership to ACSCU membership is approval of a Substantive Change.

-
- ▶ 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 USDOE if the institution participates in federal financial aid programs. Any change in name must be consistent with the institution's mission.

2. Change in the Nature of the Constituency Served

- ▶ A change in the intended student clientele.

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 should also consult the *Distance Learning Manual* to ensure that it continues to meet accreditation standards.

- ▶ 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.

3. Change in the Location or Geographical Area Served

- ▶ Offering courses or programs outside the geographic region currently served.

Example:

An institution offers courses or programs outside the community described in the current institutional mission statement, or outside the WASC region, including international sites.

Key Considerations:

An institution planning to establish a site outside of the WASC region will be evaluated jointly by ACCJC and the regional accrediting commission in which the new site is located and must therefore meet both commissions' standards. The commissions will visit the site jointly. An institution planning to establish a site outside of the U.S. designed to serve non-U.S. nationals must follow *Principles of Good Practice in Overseas International Education Programs for Non - U.S. Nationals* and *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 accreditation standards.

- ▶ Establishing an additional location geographically apart from the main campus at which the institution offers at least 50% of an educational program.

Example:

An institution offers at least half of the courses required for an associate's degree or vocational certificate at a single off-campus location.

Key Considerations:

The proposal must 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. The proposal must present evidence that the site meets accreditation standards for safety, and security, and appropriateness for the institutional programs and services conducted at the site. The institution must also demonstrate its ability and commitment to meeting the fiscal requirements 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 a branch campus, 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.

- ▶ Closing a location geographically apart from the main campus at which students can complete at least 50% of an educational program.

Example:

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

Key Considerations:

Institutions planning closure of a site must follow the Commission's *Policy on Closing an Institution*. 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 *Substantive Change Proposal*. The proposal must present evidence of program quality consistent with accreditation standards.

4. Change in the Control of the Institution

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

Example:

Sponsorship or ownership of a private institution changes.

Key Considerations:

The proposal must present evidence of the fiscal soundness of the entity 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; what the role of the president is; and how authority is vested and organized.

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 personnel, facilities, and 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 the standards 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 accreditation standards.

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

-
- ▶ Merging with another institution.

Example:

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

Key Considerations:

The proposal must present evidence that the institutions have made appropriate transition arrangements for students.

- ▶ 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 courses or programs 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 accreditation standards.

- ▶ 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 split 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 split. 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 eligibility review.

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

- ▶ Addition of a program that represents a significant departure from an institution's current programs.

Example:

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

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 and that the curriculum, faculty, equipment, and facilities meet accreditation standards. These program resources must be in place prior to submission of the Substantive Change Proposal. The college should carefully consider the consistency between the proposed program and the institutional mission.

- ▶ Addition of courses that represent a significant departure from the current curricula of an institution.

Example:

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

Key Considerations:

The institution must ensure that the curriculum, faculty, equipment, and facilities meet accreditation standards. These resources must be in place prior to submission of the Substantive Change Proposal.

- ▶ Addition of courses that constitute 50% or more of a program offered through a mode of distance or electronic delivery.

Example:

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

Key Considerations:

The institution should consult the *Distance Learning Manual* to ensure that it continues to meet accreditation standards.

6. A Change in Credit Awarded

- ▶ An increase of 50% or more in the number of credit hours awarded for the successful completion of a program.

Example:

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

- ▶ A change from clock hours to credit hours.

Example:

An institution changes the foundation for awarding credit from a 50-minute hour for each credit awarded to a calculation based on the Carnegie unit.

7. 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 very significant departure from the past.

V. Commission Process for Approving Substantive Changes

The ACCJC Annual Report

Each year the Commission requires all ACCJC member institutions to submit an Annual Report that asks for information in two areas, potential substantive changes and distance learning. The Commission includes the Substantive Change Policy with the report form so that institutions can gauge whether they need to file a Substantive Change Proposal on any of the items in the Annual Report. Upon receipt of the report, the Commission reviews information supplied by the colleges for potential substantive changes and notifies colleges if a Substantive Change Proposal is needed. This review is performed as a courtesy for colleges; the responsibility for initiating and completing the substantive change process lies with the institution. The Commission also provides the chair of the comprehensive evaluation team copies of the college's Annual Reports so that the team may check progress on potential substantive changes and report the status of such changes back to the Commission.

Determining Whether a Change is Substantive

An institution considering a Substantive Change is urged to contact the Commission staff early in its planning. Commission staff will assist colleges in determining whether the contemplated change is substantive. Early notification enables the staff to provide information and advice about the effect of the proposed change on the accredited status of the institution and to assist the college in preparing a complete proposal. Staff will also suggest to the institution areas of particular committee concern according to the type of change being proposed.

Institutions proposing Substantive Changes should communicate to the Commission via staff a description of the proposed change, the need for the change, and the anticipated effects. Commission staff will review the proposal to determine whether or not it is indeed substantive. What might be a minor change for one institution may well be viewed as a major change for another institution.

If the proposed change is determined to be a Substantive Change, the institution will be asked to complete a Substantive Change Proposal.

Substantive Change Review

1. Notification to the Commission
2. Staff Review
3. Substantive Change Committee Consideration and Action
4. Visit, If Required

Preparing the Proposal

Once the college has established the need to prepare a Substantive Change Proposal, it should follow section VI of this manual, “Format and Content of the Substantive Change Proposal,” page 17. Commission staff will assist the college by reviewing draft proposals for completeness and issues that may require further explanation or documentation. Unfortunately, due to the workload associated with Commission meeting preparation, Commission staff is not available to review substantive change drafts **from November 15 to January 15 or from April 15 to June 15.**

Timing of Proposal Submission

A candidate or accredited institution is expected to complete this process sufficiently in advance of a Substantive Change to permit approval before the change is instituted. *Note that institutions which have been declared eligible for accreditation but have not yet achieved candidate or accredited status may not employ the substantive change approval process. Note that institutions scheduled for a Comprehensive Visit may not employ the substantive change approval process in the six-month period preceding the visit. Also, when the Commission defers an action on accredited status, or places an institution on a sanction, such as Warning, Probation, or Show Cause, the Commission may defer consideration of any substantive change request until the conditions that caused the Commission to defer a decision on accredited status or to impose a sanction have been addressed and the Commission has reaffirmed accreditation.*

Commission Committee on Substantive Change

Consistent with the requirement in its standards that institutions continually assess and keep pace with student needs, the Commission has anticipated that institutions will want to make changes rapidly. In order for the Commission to respond in a timely way to institutional changes that require approval, the Commission has authorized a committee of Commissioners to review proposals and take formal actions on substantive changes. The Substantive Change Committee may act to approve the change, deny the change, or refer the proposed change to the Commission for action at either the January or June Commission meeting. The Committee may also request additional information about the change or visit the institution prior to taking any action. In addition, the Committee may require a follow-up report on the Substantive Change.

When the Committee on Substantive Change makes a determination regarding a Substantive Change, the Commission communicates the decision to the institution within two weeks of the meeting and to the entire Commission at the next regular meeting. Due to the preparation time required for Commission meetings, **no Committee meetings occur between November 15 and January 15 or between April 15 and June 15.** On occasion, especially when a proposed change is likely to have broad implications for the accredited status of the institution, the Committee will refer the decision to the entire Commission. The Commission then notifies the institution of its action within 30 days

of the decision. The letter notifying the college of denial of a Substantive Change will include reasons for the denial. In the event that the change is judged to have the potential to affect the institution broadly, the review process may be expanded to include the institution as a whole.

Appeal

If the institution wishes to appeal the decision of the Commission's Committee on Substantive Change, the appeal must be filed in writing and will be deliberated at the next meeting of the Commission. Members of the Committee on Substantive Change may participate in the discussion but will abstain from voting on the appeal.

Visits

Under federal requirements of recognized accrediting agencies, within six months of the start of operations, the Commission must visit additional locations that offer 50% or more of a program to verify that the personnel, facilities, and resources claimed at the time of the Substantive Change request are in fact present. Institutions undergoing changes in ownership, control, and/or legal status are visited within six months of the implementation of the change. If the institution is not due for a comprehensive evaluation within two years of the approval of the substantive change, an on-site evaluation, or other review as the Commission may determine, may be required. The Commission may also choose to visit additional locations, for example, when there is rapid growth in the number of such locations. Costs for an on-site visit will be borne by the institution.

Institutional Follow-Up

The Commission may require institutions to submit follow-up reports on specific issue precipitated by the substantive change. Typically these reports allow the Commission to assess the impact of the change once it has been implemented. Requirements for these reports are specified in the action letter approving the Substantive Change. These reports may be followed by a visit by Commission representatives.

Should a Substantive Change occur in close proximity to the preparation of the self study report, the college should include in the self study a description of the change and its status with the Commission (e.g., whether the Substantive Change Proposal is in draft form or under consideration by the Commission but not yet approved). Institutions should include updates of approved Substantive Changes in their next self study.

VI. Format and Content of the Substantive Change Proposal

All Substantive Change requests must receive prior approval by the Commission. In preparing the report, allow sufficient time for staff and the Substantive Change Committee to complete their review before attempting to implement the proposed change.

► Required Proposal Elements

Cover Sheet:

The cover sheet includes “Substantive Change Proposal,” the title of the substantive change, the name and address of the institution, the date of submission, and the name and title of the individual responsible for preparing the proposal. (See Appendix B for a sample cover sheet.)

Table of Contents:

The Table of Contents should have page numbers for the body of the proposal and should list appended documentation.

Contents of the Substantive Change Proposal:

The Substantive Change Proposal should include the following:

- A. A concise description of the proposed change and the reasons for it.
 - A brief description of the change.
 - Evidence of a clear relationship to the institution’s stated mission.
 - Discussion of the rationale for the change.
- B. If the substantive change involves a new educational program, a description of the program to be offered including evidence that:
 - The educational purposes of the change are clear and appropriate.
 - All relevant Commission policies are addressed.
 - The proposed program meets accreditation standards related to Student Learning Programs and Services and Resources.

-
- C. A description of the planning process which led to the request for the change, including:
- How the change relates to the institution's stated mission.
 - The assessment of needs and resources which has taken place.
 - The anticipated effect of the proposed change on the rest of the institution.
 - A clear statement of the intended improvements that will result from the change.
 - A description of the preparation process for the change.
- D. Evidence that the institution has provided adequate human, administrative, financial, and physical resources and processes to initiate, maintain, and monitor the change and to assure that the activities undertaken are accomplished with acceptable quality, including:
- Evidence of sufficient and qualified faculty, management, and support staffing.
 - Evidence of appropriate equipment and facilities, including adequate control over any off-campus site.
 - Evidence of fiscal resources including the initial and long term amount and sources of funding for the proposed change.
 - A plan for monitoring achievement of the desired outcomes of the proposed change.
- E. Evidence that the institution has received all necessary internal or external approvals, including:
- A clear statement of what faculty, administrative, governing board, or regulatory agency approvals are needed.
 - Evidence that any legal requirements have been met.
 - Evidence of governing board action to approve the change and any budget supporting the change.

F. Evidence that each Eligibility Requirement will still be fulfilled after the change. Any requirements that are particularly impacted by the change should be addressed in detail.

G. Evidence that each accreditation standard will still be fulfilled after the change and that all relevant Commission policies are addressed. Any standards that are particularly impacted by the change should be addressed in detail. Description of the process for monitoring and evaluating the effectiveness and learning outcomes expected through the proposed change.

H. Other information requested by Commission staff that is pertinent to the specific nature of the change.

Depending on the nature of the proposed change, the Commission may ask for more detailed information to assist the staff and the Substantive Change Committee in their reviews.

► Method of Submission

While the college is developing the Substantive Change Proposal, the Commission recommends sending draft proposals to staff *electronically*. Feedback on the proposal will be provided either electronically or by telephone conversation. Once the proposal is ready for review by the Commission Committee on Substantive Change, the college should mail eight (8) copies of the proposal and all supporting documentation to the Commission office.

VII. Follow-Up Visits

Visit after Substantive Change Approval of an Additional Location, Change in Ownership, Control, and/or Legal Status

A Substantive Change Proposal approved by the Commission regarding development of an additional location or a change in ownership, control, and/or legal status requires a visit within six months of the beginning of operation. The Commission will schedule a one-day visit in collaboration with the institution. The visiting team will focus on the original Substantive Change Proposal and any updated information requested by Commission staff prior to the visit. The visit will be conducted by one of the following:

- A member or members of the Commission staff.

-
- A member of the Commission staff and a member of the Committee on Substantive Change or other Commissioner.
 - The size of the visiting team will be a function of the complexity and size of the site. The staff member will serve as Chair of the team.

The visit will focus on stated concerns of the Committee on Substantive Change and evidence in regard to the change and any of the following:

- Relationship to the mission of the college.
- Needs assessment results.
- Relationship to the main campus.
- Publications advertising the new location.
- Planning processes and documents
- Educational programs offered.
- Degrees offered.
- Collegiate level.
- Sequence.
- Time to completion.
- General education and transfer.
- Curriculum development processes.
- Plans for program evaluation.
- Evidence of student learning.
- Educational purposes.
- Quality of instruction.
- Student support services.
- Financial aid issues.
- Student records.
- Learning resources.
- Enrollment data (current and projected; meeting the projected need).
- Organizational structure.
- Administrative support on site.
- Faculty and staff selection, evaluation, and support.
- Facilities and equipment.
- Funding for the location.
- Fiscal health of the institution.
- Involvement of site staff in institutional decisions.

The team Chair will prepare a report on the current status of the additional location which will be presented in draft form to the institution for any corrections of fact. A final draft will be submitted to the Committee on Substantive Change and reported to the Commission at its next meeting.

VIII. Tips for Preparing Proposals on Selected Substantive Changes

A. New Campus or Additional Location

For a new campus or additional location, the proposal should include the following:

- Projected date of the start of operations at the additional location.
- Distance from main campus.
- Evidence of need for the additional location.
- Description of how satisfaction of the need will be assessed.
- Evidence that the institution will maintain sufficient control of the location to guarantee that it meets accreditation standards.
- Evidence of official approval by the Governing Board.
- Evidence that the location will be ready to begin operation at the time of the substantive change approval.
- Evidence of sufficient fiscal and physical resources to support the additional location.
- Description of how the college will identify specific needs for services and resources of students at the additional location.
- Description of support services and learning resources available at the location.
- Description of how students will access services and resources if students are to rely on those services and resources at the main campus.
- Evidence of sufficient and qualified staff at the location, and description of processes for hiring and evaluating such staff.
- Description of the process for creating and revising curriculum for the location.

-
- ❑ Description of how programs at the location will be evaluated, including the achievement of student learning outcomes.
 - ❑ Description of the involvement of staff and students at the location in institutional planning and decision-making.

Suggestions for documentation:

- ❑ Copy of the lease.
- ❑ Operating budget.
- ❑ Pages from the class schedule indicating the address and classes offered at the location.
- ❑ Map showing main campus and additional location.
- ❑ Minutes of Board meeting showing action to approve the additional location.
- ❑ Organizational chart showing management structure for the additional location.

B. New Educational Program

The following questions can assist in determining if changes in courses or programs constitute “significant departures”:

- ◆ Will the college mission statement need to be changed to include the proposed program?
- ◆ Will the college need to acquire, build, or modify facilities in order to accommodate the proposed program?
- ◆ Will the college need to acquire new equipment for the new program?
- ◆ Will the college need to arrange for outside clinical experience or apprenticeships for the program?
- ◆ How much of the existing curriculum will be included in the proposed program?

-
- ◆ How will the new curriculum differ from existing curriculum in terms of level, content, length, rigor, and credit? Will new prerequisite courses need to be added to the curriculum?
 - ◆ Will existing general education requirements suffice?
 - ◆ Will the college need to hire faculty with expertise not found within the current faculty membership? Will the number of faculty need to increase?
 - ◆ Will learning resources need to be augmented to support the program?
 - ◆ Will student support services need to be added or adjusted?

The proposal should include the following:

- ❑ Evidence that the new program is within the scope of the institutional mission.
- ❑ Description of the analysis undertaken to determine need for the new program.
- ❑ Evidence of official approval by the Governing Board.
- ❑ Evidence of sufficient fiscal and physical resources to support the new program.
- ❑ Evidence that the program is designed to meet student need.
- ❑ Description of how satisfaction of the need will be assessed.
- ❑ Description of how the program will be reviewed compared with other programs, including the achievement of student learning outcomes.
- ❑ Description of how expertise in this new field is to be acquired in order for a quality curriculum to be developed.

-
- Evidence of sufficient and qualified staff for the program, and description of processes for hiring and evaluating such staff.
 - Description of the process for creating and revising curriculum for the program.
 - Description of program course requirements.
 - List of prerequisites and admission requirements.

Suggestions for documentation:

- Pages from the catalog.
- Course outlines.
- Chronology of development of the substantive change.
- Job descriptions showing qualifications for program faculty.

C. New Delivery Mode

- Description of the analysis undertaken to determine need for the new instructional delivery mode.
- Evidence of official approval by the Governing Board.
- Evidence of sufficient fiscal and physical resources to initiate and maintain the new delivery mode.
- Evidence that delivery systems and modes of instruction are designed to and do in fact meet student need.
- Description of how satisfaction of the need will be assessed.
- Description of how effectiveness of the delivery mode will be assessed; how the delivery mode will be reviewed compared with other modes.

-
- ❑ Description of student and faculty support for the mode of delivery.
 - ❑ Plan for equipment acquisition and maintenance.
 - ❑ Description of faculty training needed and implemented.
 - ❑ Description of how mode is considered in curriculum development process.
 - ❑ Evaluation of marketing efforts and evidence of their integrity.
 - ❑ Evaluation of information provided to students regarding the new delivery mode (e.g., equipment requirements; access to help desk).
 - ❑ Description of college accommodations for any requirements that students in distance learning courses come to campus.

Appendix A: Substantive Change Policy

*(Adopted October 1972, Revised January 1978, June 1991, June 1996,
Edited October 1997, Revised January 2002, Edited June 2002;
Edited August 2004)*

Accrediting Commission For Community And Junior Colleges Western Association of Schools and Colleges

www.accjc.org

Background

Accreditation, a voluntary process of peer review dependent on recognized standards of good practice, is in part an affirmation that the institution:

- ▶ Has clearly defined objectives appropriate to higher education.
- ▶ Has established conditions under which the achievement of these objectives can reasonably be expected.
- ▶ Presents evidence that it is in fact accomplishing the objectives substantially; is so organized, staffed, and supported that it can be expected to continue to do so demonstrates that it meets Commission standards, Eligibility Requirements, and policies.
- ▶ The scope of an institution's accreditation covers everything done in its name.

Policy

A substantive change is a change which alters: the mission, scope, or name of the institution; the nature of the constituency served; the location or geographical area served; the control of the institution; the content of courses or programs to an extent which represents a significant departure from current curricula or the mode of delivery of a program so that the courses constitute 50% and/or more of a program and/or are offered at a distance or through electronic delivery; or the credit awarded to courses or programs. Since it is the Commission's responsibility to determine the effect of a substantive change on the quality, integrity, and effectiveness of the total institution, it is the Commission's policy that such changes must be approved by the Commission prior to implementation. When an institution proposes to make a change which is considered substantive, the change must be approved according to the Substantive Change Approval Process. Upon successful review and approval, the institution's accreditation will be extended to areas affected by the change. *Note that institutions scheduled for a Comprehensive Visit may not*

employ the substantive change approval process in the six-month period preceding the visit. Also, when the Commission defers an action on accredited status, or places an institution on a sanction such as Warning, Probation, or Show Cause, the Commission may defer consideration of any substantive change request until the conditions that caused the Commission to defer a decision on accredited status or to impose a sanction have been addressed and the Commission has reaffirmed accreditation.

The following changes are all substantive changes:

1. Change in mission, scope or name of the institution.

- A change in the purpose or character of the institution.
- A change in the degree level from that which was previously offered by the institution.
- Any change in the official name of the institution.

2. Change in the nature of the constituency served.

- A change in the intended student clientele.
- Closure of an institution.

3. Change in the nature of the location or geographical area served.

- Offering courses or programs outside the geographic region currently served.
- Moving to a new location.
- Establishing an additional location geographically apart from the main campus, at which students can complete at least 50% of an educational program.
- Closing a location geographically apart from the main campus at which students can complete at least 50% of an educational program.

4. Change in control of the institution.

- Any change in the legal status, form of control, or ownership of an institution.
- Merging with another institution.
- Contracting for the delivery of courses or programs in the name of the institution with a non-regionally accredited organization.
- A change by a parent institution of one of its off-campus sites into a separate institution.

5. Change in courses or programs or their mode of delivery that represents a significant departure from current practice.

- Addition of a program that represents a significant departure from an institution's current programs.
- Addition of courses that represent a significant departure from the current curricula of an institution.
- Addition of courses that constitute 50% or more of a program, or 50% of the college's courses offered through a mode of distance or electronic delivery.

6. A change in credit awarded.

- An increase in 50% or more in the number of credit hours awarded for the successful completion of a program.
- A change from clock hours to credit hours.

Substantive Change Approval Process

Institutions wishing to effect a substantive change should follow these procedures. Note that institutions which have been declared eligible for accreditation but have not yet achieved candidate or accredited status, institutions on sanction, and institutions for whom action on accredited status has been deferred by the Commission, may not employ the substantive change approval process.

1. Notify the Commission

The institution begins the Substantive Change Approval Process by notifying the Commission of the proposed change, the need for the change, and the anticipated effects. Commission staff determine whether or not the proposed change is indeed substantive. Early notification enables the staff to provide information and advice about how the institution might best proceed through the Substantive Change Process.

2. Preparing the Substantive Change Proposal

If the Commission staff determines that the proposed change is substantive in nature, the institution is asked to submit a Substantive Change Proposal for review by the Commission's Committee on Substantive Change.

The Substantive Change Proposal should include the following:

- A concise description of the proposed change and the reasons for it.

-
- ❑ A description of the educational program(s) to be offered and evidence that the educational purposes of the change are clear and appropriate if the substantive change involves a new educational program.
 - ❑ A description of the planning process which led to the request for the change, how the change relates to the institution's stated mission, the assessment of needs and resources which has taken place, and the anticipated effect of the proposed change on the rest of the institution.
 - ❑ Evidence that the institution has provided adequate human, management, financial, and physical resources and processes to initiate, maintain, and monitor the change and to assure that the activities undertaken are accomplished with acceptable quality. If the substantive change is to establish a branch campus, 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. If the change involves the formation of a separate institution from an off-campus center or branch campus, the projected financial information must be provided for the parent institution of the proposed split. The new separate institution must begin the process for separate accreditation.
 - ❑ Evidence that the institution has received all necessary internal or external approvals. The proposal should state clearly what faculty, administrative, governing board, or regulatory agency approvals are needed and evidence that any legal requirements have been met.
 - ❑ Evidence that each Eligibility Requirement will still be fulfilled after the change. Any requirements that are particularly impacted by the change should be addressed in detail.
 - ❑ Evidence that each accreditation standard will still be fulfilled after the change and that all relevant Commission policies are addressed. Any standards that are particularly impacted by the change should be addressed in detail.
 - ❑ Other information requested by Commission staff that is pertinent to the specific nature of the change.

Commission Action:

Once the Substantive Change Proposal is received by the Commission, it is reviewed by the Commission's Committee on Substantive Change, which has full authority to act. The Committee may approve or deny a substantive change request or return it to the institution for additional information. At its discretion, the Committee may refer the decision on the substantive change request to the entire Commission at its next meeting. Commission staff keep the institution informed as to the status of the substantive change request. The institution is notified of the Committee action within two weeks of the Committee meeting. Denial of the request will include reasons for the denial.

Appeal:

If the institution wishes to appeal the decision of the Commission's Committee on Substantive Change, the appeal must be filed in writing and will be deliberated at the next meeting of the Commission. Members of the Committee on Substantive Change may participate in the discussion but will abstain from voting on the appeal.

Referral to the Commission:

In the event a substantive change request has been referred to the Commission for consideration, the institution will be notified of Commission action within two weeks of the meeting at which action occurred. In the event that the change is judged to be of such magnitude as to potentially affect the candidate or accredited status of the institution, the review process for the substantive change may be expanded to include a review of the accreditation status of the institution and a visit.

Future Visits:

Approved substantive changes should be addressed in the next comprehensive review of the institution. If the institution is not due for a comprehensive evaluation within two years of the approval of the substantive change, an on-site evaluation, or other measures as the Commission may determine, may be required. Costs for an on-site evaluation will be borne by the institution. (Note: Off-campus centers, including branch campuses, that offer 50% or more of a program are subject to an on-site inspection within the first six months of establishment. Institutions undergoing changes in ownership, control, and/or legal status will be visited within six months of the implementation of the change.)

The Commission reserves the right to request a report and visit to assess the effects of any substantive change it deems to be a very significant departure from the past, including a requirement to submit periodic prescribed reports and support special visit(s) by representatives of the Commission.

Appendix B: Sample Cover Page

Substantive Change Proposal

Title of the Change

College Name

Address

(Submission Date)

(Name of Preparer)

Appendix C: Brief Descriptions of Policies

The Commission policies summarized below are particularly relevant to specific types of substantive changes such as conducting courses through new distance learning modes, contracting with other agencies for the delivery of educational programs, and closing programs or colleges.

In the *Policy on Distance Learning, Including Electronically-Mediated Learning* the Commission recognizes that most institutions will make use of the growing range of systems for delivery of instruction, including various electronic means. The policy is based on principles of good practice to help assure that distance learning is characterized by the same concerns for quality, integrity, and effectiveness that apply to more traditional modes of instruction.

The policy on *Contractual Relationships with Non-Regionally Accredited Organizations* details the controls institutions must have in place when contracting with another entity to provide courses or programs. The policy provides guidance for contract content.

Policy on Closing an Institution includes requirements of provisions for student completion of programs and transfer to other institutions, academic records, financial aid, faculty and staff, and completion of institutional financial obligations.

These and other relevant policies are found in the Accreditation Reference Handbook, 2004.