

Substantive Change Manual

August 2009

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

Table of Contents

I.	Introduction	3
II.	Principles Underlying Substantive Change	3
III.	Rationale for Requiring Approval of Substantive Changes	3
IV.	Changes the Commission Considers Substantive	4
	A. Change in Mission, Scope, or Name of the Institution	5
	B. Change in the Nature of the Constituency Served	6
	C. Change in the Location or Geographical Area Served	6
	D. Change in the Control of the Institution	9
	E. Change in Courses or Programs or their Mode of Delivery that Represents a Significant Departure from Current Practice	11
	F. Change in Credit Awarded	13
	G. Any Other Significant Change	13
V.	Substantive Change Review and Approval Process	13
	A. The ACCJC Annual Report	13
	B. The Sequential Steps in a Substantive Change Review	14
	C. Timing of Proposal Submission	14
	D. Preparing the Substantive Change Proposal	15
	E. Committee on Substantive Change	15
	F. Appeal	15
	G. Visits	16
	H. Institutional Follow-Up	16
VI.	Required Format and Content of the Substantive Change Proposal	16
VII.	Follow-Up Visits	19
VIII.	Tips for Preparing Proposals on Selected Substantive Changes	19
	A. New Campus or Additional Location	19
	B. New Educational Program	21
	C. New Instructional Delivery Mode	23
	Appendix A: Substantive Change Policy	25
	Appendix B: Brief Descriptions of Selected Policies	31

I. Introduction

This Substantive Change Manual is designed to assist institutions as they consider significant changes and to guide institutional reflection on the impact these changes have on the institution's ability to continue to meet eligibility requirements, accreditation standards and Commission policies. The Manual is also intended to guide development of the Substantive Change Proposal, which the college produces to seek Commission review and approval of the change. In providing this information, the Commission hopes to clarify 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 the institutional mission.

The Commission 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 their 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 US Department of Education regulations require that accrediting agencies have adequate policies and procedures to ensure that any substantive changes to the edu-

cational mission, or programs of an institution, do not adversely affect the capacity of the institution to continue to meet ACCJC Accreditation Standards. Federal law mandates that accrediting agencies require institutions to obtain accreditor approval of a substantive change before it is included in the scope of the accreditation granted to the institution.

ACCJC's *Substantive Change Policy* (Appendix A) is based in part on 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 U.S. Secretary of Education, are required to review certain types 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 accomplishment. 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 substantive changes to the institution be evaluated and approved to ensure that accreditation standards are met. An institution seeks accreditation for approval by submitting a Substantive Change Proposal.

The substantive change review process provides the Commission a means for ensuring that a college maintains the educational quality and integrity of its programs and services, and that the substantive change is consistent with the institutional mission. 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.

In all cases, substantive change requires *prior* Commission approval. In some cases, a visit is necessary 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 a Commission decision to reevaluate the college's accredited status.

IV. Changes the Commission Considers Substantive

Below is a list of seven conditions which typically require substantive change approval, accompanied by illustrations (not exhaustive) and key institutional considerations for each condition. Key considerations suggest points upon which the institution should focus the proposal. The proposal should address all of the required elements (A-H as described in "Required Format and Content of the Substantive Change Proposal" on page 14 in this Manual).

Conditions *subject to prior substantive change review and approval by the Commission* include:

A. 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 processes, 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 achieve 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.

B. Change in the Nature of the Constituency Served

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. (see page 11 for new Distance Education requirements)

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 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 accreditation standards.

The closure of an institution.

Example:

An institution ceases to offer all educational courses or programs. (see page 8 for new Teach-Out requirements)

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.

C. Change in the Location or Geographical Area Served

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 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 and quality equivalent to the home campus.

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 vocational 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 vocational 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 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, security, 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 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.

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.

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 accreditation standards.

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

1. The Department 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;
2. The accrediting agency acts to withdraw, terminate or suspend the accreditation of the institution; or
3. The institution notifies the accrediting agency that the institution intends to cease operations.

The HEOA amendments stipulate that the Secretary 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.

D. Change in the Control of the Institution

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 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; what the role of the president is; and how authority is vested and organized. Institutions planning this type of substantive change should refer to the Commission *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 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.

Merging with 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 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.

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

Addition of a program or courses that represent 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.

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 consider the consistency between the proposed program and the institutional mission.

Addition of a new degree or vocational certificate program that represents a significant departure from an institution's current programs.

Example:

An institution develops a new degree or vocational 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 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 an instructional delivery that is new for the college.

Key Considerations:

The institution should consult the Distance Learning Manual and *Commission Policy on Distance Education and on Correspondence Education* for appropriate guidelines.

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 in and completes the course or program and receives the academic credit. This requirement will be met if the institution verifies the identify 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 student's identification. The institution must also publish to its students its 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.

HEOA Definitions

Distance education:

Distance education is defined, for the purpose of accreditation review, as a formal interaction which uses one or more technologies to deliver instruction to students who are separated from the instructor and which supports regular and substantive interaction between the students and instructor, either synchronously or asynchronously. Distance education often incorporates technologies such as the Internet; one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices; audio conferencing; or video cassettes, DVDs, and CD-ROMs, in conjunction with any of the other technologies.

Correspondence course:

(1) A "home study" course provided by an institution under which the institution provides instructional materials, including examinations on the materials, to students who are not physically attending classes at the institution. When students complete a portion of the instructional materials, the students take the examinations that relate to that portion of the materials, and return the examinations to the institution for grading.

(2) A home study course that provides instruction in whole or in part through the use of video cassettes or video discs is a correspondence course unless the institution also delivers the instruction on the cassette or disc to students physically attending classes at the institution during the same year.

(3) A course at an institution that may otherwise satisfy the definition of a "telecommunications course" is a correspondence course if the sum of tele-

communications and other correspondence courses offered by that institution equals or exceeds 50 percent of the total courses offered at that institution.

(4) If a course is part correspondence and part residential training.

F. 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.

Key Considerations:

Evidence supporting the need and benefit to students, and evidence of necessary resources should be in the proposal.

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.

Key Considerations:

Evidence of positive impact for students and the institution, and evidence of necessary resources should be in the proposal.

G. 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.

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.

V. Substantive Change Review and Approval Process

A. The ACCJC Annual Report

Each year the Commission requires all ACCJC member institutions to submit an Annual Report. 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.

The Commission reviews information supplied by the colleges for potential substantive changes and notifies colleges if a Substantive Change Proposal is needed. The responsibility for initiating and completing the substantive change process lies with the institution. For those institutions undergoing a reaffirmation visit, 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.

B. The Sequential Steps in a Substantive Change Review

The first step in the process for a substantive change review is to formally communicate to the Commission's substantive change staff (via email or U.S. Postal Service) a description of the proposed change, the need for the change, and the anticipated effects. 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 concern to the Committee on Substantive Change according to the type of change being proposed.

After reviewing the proposed change, Commission staff will 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. If the proposed change is determined to be substantive, the institution will be asked to complete a Substantive Change Proposal. When the proposal is determined to be a substantive change *please refer to the ACCJC Fee Schedule that each college receives annually for the Substantive Change Fee.*

C. Timing of Proposal Submission

An accredited institution is expected to complete this process sufficiently in advance of a substantive change to permit approval before the change is instituted. 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. Institutions scheduled for a Comprehensive Visit may not employ the substantive change approval process in the six-month period preceding the visit. (Please see "Rationale for Requiring Approval of Substantive Changes" for proposal submission timing as it relates to Commission accreditation sanctions, page 3.)

D. Preparing the Substantive Change Proposal

Once the college has established the need to prepare a Substantive Change Proposal, it should follow section VI of this Manual, “Required Format and Content of the Substantive Change Proposal” on page 15. Commission staff will assist the college by reviewing draft proposals for completeness and issues that may require further explanation or documentation. The draft proposal should include a table of contents with an appendix listing the documentation of appropriate evidence. Commission staff will schedule the institution for a review of the final proposal by the Committee on a first-come first-served basis.

The final proposal and a college catalog must be mailed, and one copy e-mailed, to the Commission office staff and the Committee members 30 days prior to the scheduled conference call meeting; staff will provide committee members’ mailing addresses and instructions for e-mailing or mailing to the Committee members. In each case, the institution remains responsible for the content of the proposal.

E. Committee on Substantive Change

The Commission has authorized a committee of Commissioners to review proposals and take formal actions on substantive changes. The Committee on Substantive Change may act to approve, defer, deny the change, or refer the proposed change to the entire 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. The Committee on Substantive Change normally meets once a month during the academic year; it does not meet in January or June, when regular Commission meetings occur.

When the Committee on Substantive Change makes a determination regarding a substantive change, the Commission communicates the decision to the institution via e-mail within two weeks of the meeting, with a formal letter following within four weeks, and to the entire Commission at the next regular meeting. When a substantive change decision is made at the Commission meeting, the Commission notifies the institution of its action within 30 days of the decision. If a substantive change is denied, the letter 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.

F. Appeal

If the institution wishes to appeal the decision of the 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.

G. Visits

Under federal requirements of recognized accrediting agencies, the Commission must visit the college within six months of the start of operations of certain substantive changes. 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 Proposal 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 may be required by the Commission. The Commission may also choose to visit additional locations, for example, when there is rapid growth in the number of such locations. The Commission requires institutions to absorb the costs of a site visit.

H. Institutional Follow-Up

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

While not ideal, should a substantive change review already be in progress in close proximity to the preparation of the self study report, the college should then include 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. Required Format and Content of the Substantive Change Proposal

Cover Sheet:

The cover sheet must include “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.

Table of Contents:

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

The Substantive Change Proposal should include the following content where applicable:

- 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 planning process and 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 benefits that will result from the change.
 - A description of the preparation and planning process for the change.
- D. Evidence that the institution has analyzed and provided for adequate human, administrative, financial, and physical resources and processes necessary 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.
 - Evidence of 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, and evidence that they have been obtained.
 - 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 related to 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 related to the change and that all relevant Commission policies are addressed. Any standards that are particularly impacted by the change should be addressed in detail. There should be a 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 Committee on Substantive Change in their reviews.

While the college is developing the Substantive Change Proposal, the Commission

recommends sending a draft proposal to staff *electronically*. Feedback on the proposal will be provided electronically. Once the proposal is ready for review by the Committee on Substantive Change, send one hard copy and one electronic copy to Commission staff. Staff will send instructions for mailing (U.S. Postal Service only) and will forward the electronic copy to the appropriate Committee members.

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 contents of the original Substantive Change Proposal and any updated information requested by Commission staff prior to the visit, as well as any stated concerns of the Committee on Substantive Change.

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 and proposed change. The staff member will serve as Chair of the team.

A draft report of the substantive change visit will be presented to the institution for any corrections of fact. A final visit report will be submitted to the institution, filed with the institution's ACCJC records and reported to the Commission at its next meeting.

VIII. Tips for Preparing Proposals on Selected Substantive Changes

- A. 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 and sustain 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 for a New Campus or Additional Location:

- Copy of the lease and/or floor plans.
- Operating budget and analysis of substantive change financial resources as they relate to the college 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. For a New Educational Program, some questions to assist in determining if changes in courses or programs constitute “significant departures:”
- Does the college mission statement need to be changed to include the proposed program?
 - Does the college need to acquire, build, or modify facilities in order to accommodate the proposed program?
 - Does the college need to acquire new equipment for the new program?
 - Does 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?
 - How will existing general education requirements, as required by the standards, be sustained?
 - How will the college meet the need to hire faculty with expertise not found within the current faculty membership, should the number of faculty need to increase?
 - How will learning resources be augmented to support the program?
 - How will student support services need to be added or adjusted?

For a New Educational Program, 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.
- Description of student support services for the program.
- List of prerequisites and admission requirements.

Suggested documentation for New Educational Programs should include:

- Pages from the catalog, if appropriate.
- Course outlines.
- Chronology of development of the substantive change.
- Administrative organizational chart.
- Budget for the change, integration with college budget, plans for

sustainability.

- Job descriptions showing qualifications for program faculty.

C. For a New Instructional Delivery Mode, the proposal should include:

- 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.

D. Considerations for Distance Learning Programs:

Unexpected Growth

Recent history (2-5 year span) of Distance Learning on the campus
Increase in the number of courses offer on line
Increase in the number of faculty teaching online courses
Increase in the number of students taking online courses

Increasing Expectations

Institutional processes that impact student access and completion of on line programs: admissions, orientation, registration, advising, financial aid course delivery, communication with students, tutoring services graduation applications, transcript requests, student survey collection and analysis

Student Success/Student Achievement Data

Class size
Student retention and withdrawal rates/data
Student course completion rates/data
Online pass rate compared with seat-time pass rate
Student data collection and analysis
Use of student data for improvement

Quality Assurances

Academic Integrity; course content between online and seat-time courses
Faculty online teaching capability
Student capability for online delivery
Faculty and student support services
Faculty and student learning assessment systems
Integration with institutional mission
Student authentication

Appendix A

Accrediting Commission for Community and Junior Colleges Western Association of Schools and Colleges

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)*

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. (Please refer to *Policy on Closure of Institutions.*)

3. Change in 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 which action on accredited status has been deferred by the Commission, may not employ the substantive change approval process.

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.

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

Brief Descriptions of Selected 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, sharing functions with a related entity, and closing programs or colleges. These and other relevant policies are found in the Accreditation Reference Handbook, 2008.

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 Institutions with Related Entities is intended to ensure that accreditors receive appropriate assurances and sufficient information and documentation to determine whether such institutions comply with Commission standards and policies. It addresses change of ownership and details the specific information that is needed in addition to substantive change or other policies.

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.

Interregional Policies on the Accreditation of Institutions Operating Across Regions are based upon the premises that the home region should be demonstrably accountable for its accreditation decisions affecting institutions operating in host regions and that the host region has a legitimate interest in the quality of institutions from other regions operating within its jurisdiction. These policies address the evaluation and procedures for accreditation of institutions operating interregionally.