



# Substantive Change Manual

A Guide to  
Substantive Change

## Policies and Procedures



*Senior College and University Commission*



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## Preface

The WASC Senior College and University Commission (WSCUC) has required prior approval of institutional substantive changes in degree programs, methods of delivery, and organizational mission, status or form of control since 1979. The substantive change process is designed to ensure the consistency of quality across all institutional operations, on- and off-campus and through distance education, and to ensure that institutions undergoing major changes continue to meet the Standards of Accreditation. The concern for quality has grown as off-campus programs have crossed regional and international boundaries, technology-mediated learning has flourished, more institutions have begun to offer both professional and research doctorates, and an increasing number of institutions have merged or affiliated with other institutions.

In 1994 and 2008, the Higher Education Reauthorization Acts led to a significant number of regulations concerning substantive change. Among the regulations adopted by the U.S. Department of Education were federally mandated site visits to off-campus degree programs, authentication of students enrolled in distance education (online) programs, and requirements regarding the credit hour.

Under both Commission policy and federal law, certain substantive changes are required to have prior approval. In its development of substantive change policies, WSCUC has responded to relevant Department of Education regulations (refer to Section I: Substantive Change Policies). The procedures defined in this manual provide guidelines for institutions to demonstrate compliance with these regulations, as well as other WSCUC requirements.

The source documents for this manual, as well as supplementary materials, may be found in the Document Library on the WSCUC website, [www.wascsenior.org](http://www.wascsenior.org). The Commission welcomes suggestions for improving this manual and the change process. Please send all comments to the WSCUC office at [wascsr@wascsenior.org](mailto:wascsr@wascsenior.org) or through the WSCUC website at [www.wascsenior.org](http://www.wascsenior.org).

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## New in This Edition

Several changes to policies and procedures have been implemented and are described in more detail in this manual. Here are the highlights:

### Hybrid Competency-based Degree Programs

WSCUC has revised its competency-based (CBE) degree program policy to allow for hybrid CBE programs. These programs may use a combination of competency-based assessments and credit hours toward degree completion requirements. An institution is expected to seek prior WSCUC approval when 50 percent or more of a degree program is awarded on the basis of the assessment of student competencies. See page 16 for more information.

### Institutional Response to Structural Change Visit Reports

Institutions undergoing a structural change review (new degree level, first competency-based degree program, or change of mission or ownership/control) may provide a written response to the structural change site visit report. This response will be shared with the Commission during its review of the proposed change, and will be posted on the WSCUC website with the visit report once the change is approved. See page 34 for more information.

### Structural Change Review for “Incubation” Relationships

WSCUC has developed new guidelines for the review of proposals for which a WSCUC-accredited institution seeks to create a formal relationship with an entity that is not WSCUC accredited with the stated intent of the unaccredited entity evolving within the accredited institution to the point of becoming separately accreditable under WSCUC policies. Such a change requires structural change review and approval. See page 24 for more information.

### Change to Proposal Submission Process

WSCUC is no longer using Live Text for the submission of substantive change proposals. Institutions must now submit substantive change proposals through Box.com, an online file sharing and cloud content management service. Institutions must create a free Box.com account for uploading files for WSCUC review. Contact the substantive change staff for more information.

### New Resources

Two new resources are now available to assist in the development of substantive change proposals.

- Appendix 4 of this manual includes a list of common issues in substantive change proposals for new degree programs that result in a Not Accept action, including relevant proposal template sections and related CFRs.
- The WSCUC standards and CFRs have been mapped to substantive change proposal requirements. This document is available on the substantive change resources page on the WSCUC website at <http://www.wascsenior.org/resources/subchange>.

# Section One: Substantive Change Policies

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## Commonly Asked Questions about Substantive Change

### **What is substantive change?**

As defined in the *Handbook of Accreditation*, a substantive change at an accredited or candidate institution is defined as one that may significantly affect an institution's quality, objectives, scope, or control.

### **Why does WSCUC review substantive changes?**

WSCUC is committed to ensuring high quality and to making certain that any changes in degree programs, teaching modalities or locations, scope of offerings, and control of the institution are in keeping with the Standards of Accreditation. In addition, substantive change review procedures are mandated by the Department of Education. See Appendix 1 for federal regulations governing substantive changes.

### **How far in advance of my implementation date should I submit a substantive change application?**

Institutions are encouraged to submit the Substantive Change application and appropriate fee at least six months prior to the planned implementation date of the change to ensure a spot on the review calendar and to provide adequate time for review and approval by the Commission. Structural changes should be calendared at least nine months in advance. Institutions are encouraged to plan accordingly because programs cannot be started without WSCUC approval.

### **Who reviews my proposal for a substantive change?**

Proposals are reviewed by the WSCUC staff and members of the Substantive Change Committee, who are peer reviewers from member institutions chosen for their experience in higher education. Structural change proposals are also reviewed by members of the Structural Change Committee of the Commission. The WSCUC website ([www.wascsenior.org](http://www.wascsenior.org)) lists members of the Substantive Change Committee and the Structural Change Committee.

### **How do I determine if a change requires approval?**

This manual outlines the policies and procedures that govern substantive change. However, if you are uncertain whether a proposed change requires prior approval, contact your WSCUC Staff Liaison or the Substantive Change staff prior to implementing the program.

### **Are there some institutional changes that require review beyond substantive change?**

In some cases, the Commission may require a comprehensive institutional review, instead of a substantive change review or structural change review, when it deems that the changes made or proposed at an institution are of such scope or significance that they would change the fundamental nature or character of the institution. Comprehensive reviews include a self-study, an off-site review and an on-site team visit. Changes that may trigger a comprehensive review include, but are not limited to:

1. Rapid growth in new degree programs in any modality
2. Multiple extensive changes to existing degree programs
3. Rapid growth in student enrollments
4. Rapid growth in campuses or off-campus locations for degree program delivery
5. A change of ownership or control combined with a change of mission

## Overview of WSCUC's Substantive Change Policies

The Commission's substantive change policies have been developed to ensure that new programs, modalities and other important changes are made in keeping with the Standards of Accreditation. This manual outlines many of these policies in detail. Additionally, a list of WSCUC policies related to substantive change is shown in Appendix 2.

Some of the issues that these policies are designed to address include:

- The overall quality of distance education and off-campus programs
- Distinctions between on- and off-campus and distance education programs with regard to faculty responsibility and oversight, academic rigor, student support, adequacy of library and computer resources, and the nature of the general education component for the undergraduate degree
- Capacity of the institution to offer programs at a higher or lower degree level than that previously offered by that institution
- Increases in collaborative offerings among institutions
- Institutional partnerships with unaccredited entities planning to provide core academic services
- The complexities of changes in control and ownership of an institution

## Understanding Degree Level and Modality Approval

### Degree Programs

The Commission has established three categories of degree level approval for the purposes of accreditation and substantive change processes: General, Specified, and Individual. These designations determine whether certain kinds of new degree program offerings have to be approved through the substantive change process.

Each institution is designated by the Commission as having one of the three categories of approval at each degree level: associate, bachelor's, master's, professional doctorate, and research doctorate. Guidelines for each category of degree-granting approval are described in WSCUC's Degree Level Approval policy.

An institution must seek prior approval before implementing any degree programs at a degree level for which it does not have General or Specified (in a particular field or discipline) degree-granting approval.

Note that only the Commission can change an institution's level of degree-granting approval. This is outside the scope of the Substantive Change Committee. Contact your WSCUC staff liaison or the substantive change staff if you have questions about the degree level approval currently assigned to your institution.

### Distance Education Programs

The Commission may award General modality approval to institutions that have five distance education degree programs which have been in operation for at least five years. The institution must also be in good standing (not on sanction). This designation exempts an institution from seeking prior approval for new distance education programs at degree levels for which the institution has General or Specified degree level approval. Please contact your staff liaison or the substantive change staff if you have questions about your institution's eligibility for this designation.

Institutions that do not have General modality approval must obtain substantive change approval for each new program of which 50 percent or more will be offered through distance education.

### Institutions on Sanction

If an institution has been issued a sanction by the Commission (Warning, Probation, or Show Cause), all new programs, locations, or organizational changes must be reviewed by the Substantive Change Committee and approved by the Commission prior to implementation, regardless of the institution's degree-level approval status. In some cases, an institution may be prohibited from implementing new programs or locations until the sanction is removed. Contact your WSCUC staff liaison if you need further information.

## Levels of Substantive Change Review

In some cases, a substantive change proposal may be reviewed by the WSCUC staff. In other cases, the proposal is reviewed by the Substantive Change Committee and/or the Structural Change Committee of the Commission. Levels of review are dictated by federal and Commission requirements.

**Staff Review.** WSCUC staff members may review the addition of new locations or programs under these circumstances:

- New stand-alone location at which 50 percent or more of a degree program is offered and that is located 25 miles or more from the main campus or an approved branch campus (if the degree programs offered there do not require approval)
- New branch campus location (after the first location has been approved by the Substantive Change Committee)
- New degree program, distance education program, or location authorized for Fast Track review

**Committee Review.** The Substantive Change Committee reviews new degree programs or changes involving alterations to delivery methods of existing degree programs, such as online and off-campus programs, including:

- New degree program at a degree level for which the institution does not have General or Specified degree-granting approval
- New modality—distance education (if the institution does not have Fast Track authorization or General modality approval), or competency-based program
- First branch campus location reviewed by WSCUC
- International degree granting location
- Change in length of a degree program (typically an increase or decrease of 25 percent or more)

- New degree program which will be delivered in partnership with an institution or organization not certified to participate in title IV, HEA programs
- Dual degree program
- Joint degree program
- Teach-out agreement with another institution if the agreement results in the establishment of a new location.

**Structural Change Review.** A structural change review consists of a review by the Substantive Change Committee as well as the Structural Change Committee of the Commission. These reviews are required for complex changes that reach beyond a particular program and affect the institution as a whole, including:

- First degree at a degree level at which no programs have previously been offered. (Research doctorates and professional doctorates are considered as distinct degree levels.)
- Joint degree, if at a new degree level for either institution
- First competency-based or direct assessment program
- Change in mission
- Change in legal status, ownership or control, including mergers and acquisitions

Institutions are reminded to consult with their WSCUC staff liaison or the substantive change staff regarding the change being proposed. The liaison can confirm the appropriate category of the change and identify any restrictions on or additional requirements for substantive change that have been imposed on the institution by the Commission.

# Overview of the WSCUC Commission and the Substantive Change Process

## WASC Senior College and University Commission

### WSCUC Staff

Carries out the work of the agency under direction from the Commission. Coordinates the review of substantive changes and structural changes, site visits, and Commission actions. Staff members conduct preliminary reviews of proposals and facilitate substantive change conference call reviews with members of the Substantive Change Committee. For certain types of changes, staff may review proposals and take action.

### Substantive Change Committee

On committee of the WSCUC standing committees comprised of members of peer institutions chosen for their experience in higher education. The committee meets in panels to review substantive change and structural change proposals, conduct site visits, and make recommendations to the Commission. Substantive changes are referred to the full Commission (or the Executive Committee) for action. Structural changes are referred to the Structural Change Committee.

### WSCUC Commissioners

Commissioners are nominated and elected by the chief executive officers of accredited institutions in the WSCUC region and serve overlapping three-year terms. The Commission meets twice a year (Feb and June) to take action on accredited institutions, including substantive changes and structural changes. The Commission also convenes a retreat in November for orientation and planning.

### Structural Change Committee

One of five standing committees of the Commission. The committee reviews structural change proposals and recommends action to the full Commission. It meets in person during the three Commission meetings each year, and in panels by conference call as needed.

### Executive Committee

Comprised of the chair of each of the other four standing committees of the Commission, as well as the Commission Chair and Co-chair, and one public member. Meets monthly to discuss Commission business and take action on substantive and structural changes. May act in lieu of the full Commission on certain issues.

**Table 1: Substantive Change Categories**

This table lists the substantive change categories associated with each level of review and indicates whether a site visit is required.

Type of Review		Level of Review	Site Visit Required?
NEW PROGRAM	New on-site degree program <sup>1</sup>	Committee review <sup>2</sup>	No
	New distance education <sup>3</sup> or competency-based degree program <sup>4</sup>	Committee review <sup>2</sup>	No
	Dual degree program <sup>5</sup>	Committee review <sup>2</sup>	No
	Joint degree program <sup>5</sup>	Committee review <sup>2</sup>	No
NEW SITE	New site (50% or more of a degree program, less than 25	No review required	No
	New site (50% or more of a degree program AND 25 miles or more from main campus or WSCUC-recognized branch campus)	Staff review (if offering already approved degree programs)	Post-implementation visit may be required within six months of implementation
	New international site (50% or more of a degree program)	Committee review	Post-implementation visit may be required within one year of implementation
	New branch campus (50% or more of a degree program)	Committee review for first location / Staff review for additional locations	Post-implementation visit may be required within six months of implementation
OTHER	Fast Track Authorization: modality or degree level (granted for five years)	Committee review	No
	Duration: change in length of degree program (25% or more)	Committee review	No
Structural Changes			
DEGREE LEVEL	First degree program at a new degree level (including joint degree)	Structural change review	Pre-implementation visit may be required
DEGREE PROGRAM	First competency-based degree program	Structural change review	Pre-implementation visit may be required Post-implementation visit may be required within one year of implementation
ORGANIZATIONAL	Change of mission, legal status, or form of control	Structural change review + possible legal review	Pre-implementation visit may be required Post-implementation visit may be required within six months of implementation

1 For institutions with Individual (I) Degree Level Approval designation and for those with the Specified (S) designation that are seeking to offer a program outside the scope of their approval.

2 If the program is also the first program at a new degree level, the proposal will be reviewed by the Committee and the Commission (structural change) and will require a site visit.

3 For institutions that do not have General Modality Approval for distance education.

4 The first competency-based degree program at an institution will be reviewed by the Committee and the Commission (structural change) and will require a site visit.

5 See sections in this manual on Dual Degree Programs and Joint Degree Programs for more information on approval requirements.

## Changes Requiring Staff Review

Certain types of changes may be reviewed by a WSCUC staff person. The institution submits an expedited proposal and is notified of the outcome of the review within 30 days. No further Commission approval is required. See the Schedule of Dues and Fees for the cost of an expedited review.

### OFF-CAMPUS SITE: Stand-Alone Location or Branch Campus

WSCUC requires prior approval for two types of off-campus sites: stand-alone locations and branch campuses, under circumstances specified below. Proposals to establish a new location must include the following:

- The educational program(s) to be offered
- The projected revenues and expenditures and cash flow
- The operation, management, and physical resources

Distance education telecast locations are not considered to be new sites. Telecast locations fall under the distance education category.

Note that the Department of Education requires that WSCUC maintain addresses of ALL locations geographically separate from the main campus at which 50% or more of at least one educational program (including title IV eligible credentials and certificates) is offered, regardless of their distance from the main campus. It is the responsibility of every accredited institution to report accurate and current addresses to WSCUC. As of March 1, 2015, institutions must report, as part of the annual report process, locations at which 50 percent or more of a credential or certificate is offered if title IV financial aid is awarded for those credentials or certificates, regardless of whether a degree program is offered at that location.

### Definitions

A **stand-alone location** is a site where 50 percent or more of at least one degree program is offered more than 25 miles (as the crow flies) from the main campus or a WSCUC-approved branch campus. This applies to locations within the United States or abroad.

A **branch campus** is an expanded off-campus location that may serve as an administrative and support center for additional locations and as a facility for offering off-campus programs. Development of a branch campus allows an institution to open additional off-campus locations within 25 miles of the branch campus without seeking prior WSCUC approval for each location. A specific review for approval of a branch campus is required.

To be designated as a branch campus, the location must meet all of the following requirements:

- 50 percent or more of at least one degree program will be offered at the location
- The location is 25 miles or more from the main campus
- The location is permanent in nature
- The location has its own faculty and administrative or supervisory organization
- The location has its own budgetary and hiring authority

### Domestic Locations

The first branch campus proposed by an institution is subject to a panel review by the Substantive Change Committee. Additional branch campuses, and all stand-alone locations, will be reviewed by the staff. If during the review, staff members determine that the proposed location requires additional review, or if an institution's accreditation status has changed (i.e., placed on sanction), a Committee review and an additional fee may be required.

Once a stand-alone location or branch campus is approved with at least one degree program, an institution may offer any other approved on-site programs at that location without seeking substantive change approval. Institutions may call their off-campus sites branch campuses, satellite centers, extension programs, or whatever else they choose.

Institutions that seek approval of more than four off-campus locations in a year are subject to a staff review. This review could trigger a) a Special Visit to assess growth over the past three years or b) a comprehensive review to assess the institution's ability to maintain high quality in light of its rapid growth.

### **International Locations**

All locations to be operated outside of the United States require review by the Substantive Change Committee.

### **New Sites within 25 Miles of Main Campus or Branch Campus**

Sites within 25 miles of the main campus or WSCUC-designated branch campus do not require prior approval but must be reported to WSCUC within 30 days of establishment using the Program Implementation Form found in the Document Library or in the "Locations" tab of your institution's listing in the Institution Directory (<http://www.wascsenior.org/institutions>) on the WSCUC website.

### **Partnerships with Other Institutions**

An institution planning to offer degree programs with another institution must submit a Memorandum of Understanding (MOU) or comparable document with its proposal that clearly articulates each institution's responsibility for academic and support services. The arrangements must adhere to WSCUC's policy on Agreements with Unaccredited Entities.

### **Site Visit Requirement**

A site visit may be required within six months after the establishment of new off-campus locations that require substantive change approval. Typically, the first three off-campus sites established by an institution must be visited. The first location in each country outside of the United States must also be visited.

### **Reopening a Site**

If an off-campus site or branch campus has been closed for more than two years and the institution wishes to reopen it, the site may require substantive change approval.

### **Moving a Site**

An institution is required to notify WSCUC when it moves the main campus or an approved off-campus site. Failure to do so may result in the loss of WSCUC-approval if the site is moved and the change is not reported to WSCUC prior to, or at the time of, the move.

The change of location of the main campus must be reported to WSCUC sufficiently in advance for WSCUC staff to review the plans for the move.

Changes of location for off-campus sites within 25 miles of the main campus or WSCUC-approved branch campus do not have to be approved as substantive changes, but must be reported to WSCUC on the Change of Address Form found in the Document Library or in the "Locations" tab of your institution's listing in the Institution Directory (<http://www.wascsenior.org/institutions>) on the WSCUC website.

For off-campus sites more than 25 miles from the main campus or approved branch campus: If the new location is within five miles of the previous site, and its character, services, and programs are

not substantially different from the previously approved site, the new site does not need to be approved, but must be reported as a change of address. Sites moved more than five miles may require approval.

No fee is charged for a change of address that does not require prior approval.

#### **Renaming a Site**

Changing the name of a site, including the main campus, does not require prior approval. The change must be reported to WSCUC prior to, or at the time, of the change.

#### **Closing a Site**

If an institution intends to cease operations entirely or close any site that offers 100 percent of at least one degree program, the institution must submit for approval a teach-out plan to its WSCUC staff liaison. A Committee review may be required, at the staff member's discretion. For more information, see the Teach-Out Plans and Agreements Policy, available in the Document Library on the WSCUC website.

#### **Teach-Out Agreement with Another Institution**

If an institution determines that one or more programs will be taught out and enters into an agreement with another institution to teach-out its programs, the matter must be reviewed by the WSCUC staff liaison prior to implementation. If the partner institution plans to establish a new off-campus location that will operate beyond the terms of the teach-out, the location is also subject to substantive change review. See the Teach-Out Plans and Agreements Policy, available in the Document Library on the WSCUC website.

### **FAST TRACK REVIEWS**

Once an institution has obtained Fast Track Authorization, the expedited review process may be used for substantive change requests that fall within the authorization. Fast Track authorization is available for distance education programs, international locations, and new programs at the bachelor's or master's degree level.

See the section on Fast Track Authorization below for more information on how to apply.

# Changes Requiring Substantive Change Committee Review

Substantive change committee reviews (comprising review and approval by the Substantive Change Committee, as well as approval by the Commission) are required for the following kinds of changes:

## NEW DEGREE PROGRAM

This category includes the addition of a degree program at institutions with Individual or Specified (as appropriate) degree-granting approval. This requirement applies to any program offering 50 percent or more of a degree. Note that for undergraduate programs, the 50 percent rule applies only to the program hours in the major, not the total hours it takes to graduate with a degree. The initiation of a few courses that equal less than 50 percent of a degree program or a new certificate or credential program does not require WSCUC approval. Contact your WSCUC staff liaison or substantive change staff to determine your institution's level of degree-granting approval, if unknown.

If an institution has been approved by the Commission to offer programs at a degree level (associate, bachelor's, master's, research doctorate, or professional doctorate), it does not necessarily have blanket authority to initiate additional programs at that degree level without prior approval. Institutions with Individual degree-granting approval must seek prior approval for all new programs until the Commission grants the institution General or Specified degree-granting approval at that degree level.

The ability to change an institution's degree-granting approval is outside of the scope of the Substantive Change Committee. Institutions are encouraged to speak with their WSCUC staff liaison if they believe a change of degree level approval designation is warranted.

## Restarting a Program

A previously approved degree program that has not been offered for at least two years may require substantive change approval to be offered again.

## Changing the Name of a Program

Changing the name of an approved program does not require approval unless other significant changes have been made to the curriculum or length of the program. Institutions should notify WSCUC in the annual report or by email when a name change has occurred. If additional changes have been made to the program and it is unclear whether the program may require substantive change review, please consult your staff liaison or the substantive change staff.

## Changing the Curriculum or Requirements of a Program

WSCUC may require substantive change approval when proposed alterations would result in a significantly different program. This is typically triggered by changes of 25 percent or more in the curriculum.

## Special Requirements for Doctoral Degrees

Institutions that do not have General degree level approval to offer doctoral programs must seek approval for each new degree program. The institution must demonstrate an understanding of the distinctive character of doctoral education, support a doctoral culture while maintaining institutional capacity, and sustain appropriate systems of educational effectiveness at the highest level of graduate education.

Proposals must define the nature and significance of the doctoral degree for the institution and provide a comprehensive analysis of institutional capacity to support student learning at this advanced level. The analysis must be presented in the context of institutional capacity and the educational effectiveness of existing degree levels.

Proposals are expected to use the Standards of Accreditation and CFRs, as listed in the Handbook of Accreditation, as a framework for analysis. In light of the four Standards, the Commission expects that institutions will consider the following issues in proposals seeking prior approval of the doctorate:

### **Doctoral education must be aligned with institutional purposes and educational objectives. (Standard 1)**

An institution engaged at this level is making a conscious commitment to create an institutional culture that is supportive of research and professional practice. It is appropriate for an institution to ask itself how this culture fits within the existing institutional mission.

### **The objectives of doctoral education have particular implications for core institutional functions. (Standard 2)**

Doctoral programs differ substantially from other degree levels in the depth and breadth of required study, in the increased demands on student intellectual and creative capacity, and in the commitment to developing scholars and practitioners at the highest level. Institutions need to consider whether the program is structured to meet these higher expectations for the degree level by demonstrating how student learning outcomes will be achieved and how support for scholarship and creative activity will be provided for professional development of faculty members and students.

### **Doctoral education requires specialized resources. (Standard 3)**

The intellectual interaction between doctoral students and faculty is distinctive and central in doctoral education. Institutions need to consider whether the program has the faculty, library and information resources, and organizational support services to meet the requirements of the advanced degree.

### **Doctoral education requires special processes for evaluating educational effectiveness. (Standard 4)**

Institutions need to demonstrate that quality assurance systems are aligned with the expectations of a doctoral-level education, and are fully integrated with the existing academic culture.

## DISTANCE EDUCATION DEGREE PROGRAM

Institutions must obtain substantive change approval for each new program in which 50 percent or more will be offered through distance education. Note that for undergraduate programs the 50 percent rule applies only to the program hours in the major, not the total hours it takes to graduate with a degree.

The Commission may award General modality approval to institutions that have five distance education degree programs which have been in operation for at least five years. The institution must also be in good standing. This designation exempts an institution from seeking substantive change approval for new distance education programs at degree levels for which the institution has General or Specified degree level approval. Please contact your staff liaison or the substantive change staff if you have questions about your institution's eligibility for this designation.

### Definitions

**Distance Education** delivers instruction to students who are separated from the instructor. It supports regular and substantive interaction between the students and the instructor, either synchronously or asynchronously, via these technologies:

1. The Internet
2. One-way or two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband, fiber optic, satellite, or wireless communication devices
3. Audio conferencing

### Verification of Student Identity

In keeping with federal policy, WSCUC requires institutions that offer distance education to have processes in place through which the institution establishes that each registered student is the same student who participates in and completes the course or program and receives the academic credit. Therefore, the institution must employ methods such as:

1. A secure log-in and pass code
2. Proctored examinations
3. New or other technologies or practices that are effective in verifying student identity

In so doing, the institution must make clear in writing at the time of enrollment or registration that it uses processes that protect student privacy and must notify students of any additional fees associated with the verification of student identity.

## COMPETENCY-BASED OR DIRECT ASSESSMENT DEGREE PROGRAM

### Definitions

Competency-based (CBE) or direct assessment programs do not measure student learning in terms of credit hours or clock hours. Instead, they use the assessment of a student's attainment of competencies as the primary means of determining whether the student earns a degree. Institutions may currently be incorporating elements of competency-based award of credit in which some components of a degree program are satisfied through assessment of competencies. When the assessment of competencies serves as the singular basis for the award of the degree, it meets the definition set by the U.S. Department of Education as a "direct assessment" program. Federal policy requires that the Secretary of Education approve a direct assessment program subsequent to WSCUC approval if students will be eligible for title IV funds for the program.

As applied to the WSCUC Substantive Change policy, a direct assessment program has five main elements:

1. The program is designed and delivered within the framework of the program's defined knowledge, skills, and dispositions (competencies) as demonstrated by students, rather than in terms of prescribed courses.
2. A student may acquire the requisite competencies from multiple sources and at various times other than, or in addition to, the learning experiences provided by the institution. As such, the length of time it takes to demonstrate learning may be different for each student. Time is the variable; learning is the constant.
3. The institution employs assessment strategies that are capable of establishing each student's achievement of each competency at the level of rigor appropriate to the degree being offered. These strategies will be responsive to the complexity of learning and the accumulation and integration of knowledge expected for the degree, such as through capstone projects or portfolios.
4. The institution establishes that the outcomes for the degree are equivalent in scope and rigor to those of recognized degree programs offered in traditional formats at other institutions or in its own course catalog.
5. The institution has well-developed policies that address related WSCUC and/or federal requirements, including for: credit hour definitions; transcript recording and reporting; the assessment and award of credit for prior learning; the roles of faculty members and other educational professionals; disbursement of financial aid; and tuition charges and refunds.

An institution is expected to seek prior WSCUC approval when 50 percent or more of the degree program is awarded on the basis of the assessment of student competencies. The first competency-based or competency/credit hour hybrid program at an institution will be reviewed as a structural change. A specific template is provided for CBE or direct assessment program proposals.

### **OFF-CAMPUS SITE: Branch Campus**

A **branch campus** is an expanded off-campus location that may serve as an administrative and support center for additional locations (with a 25 mile radius), as well as a facility for off-campus programs. The development of a branch campus may be most effective for institutions that plan to offer off-campus programs at multiple locations within a geographic region. A specific review for approval of a branch campus is required to achieve the exemption for additional locations.

To be designated a branch campus, the location must meet all of the following requirements:

- Be permanent in nature
- Be located 25 miles or more from the main campus or another approved branch campus
- Offer 50% or more of at least one degree program
- Have its own faculty and administrative or supervisory organization
- Have its own budgetary and hiring authority

The first branch campus proposed by an institution is subject to a panel review by the Substantive Change Committee. Additional branch campuses, and all stand-alone locations, will be reviewed by the WSCUC staff, unless an institution's accreditation status has changed (i.e., placed on sanction)

or the staff determines that a proposal requires a fuller review. In such cases, a Committee review and an additional fee may be required.

Once a stand-alone location or branch campus is approved with at least one degree program, an institution may offer any other approved on-site programs at that location without prior substantive change approval. Institutions may call their off-campus sites branch campuses, satellite centers, extension programs, or whatever else they choose.

Institutions that seek approval for more than four off-campus locations in a year are subject to a staff review, which could trigger a) a Special Visit to assess growth over the past three years or b) a comprehensive review to assess the institution's ability to maintain high quality in light of its rapid growth.

### **OFF-CAMPUS SITE: International Location**

Plans for **international locations** at which 50% or more of at least one degree program will be offered require review by the Substantive Change Committee. The first international location in each country requires a follow-up site visit six months to one year after implementation. Additional locations in a country may require a visit at the review panel's discretion.

### **TEACH-OUT**

#### **Closing a Program**

WSCUC does not review or approve teach-out plans for the discontinuation of degree programs unless the plan includes the closure of a degree granting location. Institutions are, however, expected to comply with the Teach-Out Plans and Agreements Policy. Program closures may be reported on the annual report each year.

#### **Closing a Site**

If an institution intends to cease operations entirely or close any site that offers 100 percent of at least one degree program, the institution must submit for approval a teach-out plan to its WSCUC staff liaison. A Committee review may be required, at the staff member's discretion. For more information, see the Teach-Out Plans and Agreements Policy, available in the Document Library on the WSCUC website.

#### **Teach-Out Agreement with Another Institution**

If an institution determines that one or more programs will be taught out and enters into an agreement with another institution to teach-out its programs, the matter must be reviewed by the WSCUC staff liaison prior to implementation. If the partner institution plans to establish a new off-campus location that will operate beyond the terms of the teach-out, the location is also subject to substantive change review. See the Teach-Out Plans and Agreements Policy, available in the Document Library on the WSCUC website.

### **JOINT DEGREE PROGRAM**

A joint degree program is one that is offered in partnership between two or more accredited institutions and leads to the award of one degree with both institutions' names on the diploma. If one or more of the institutions involved does not have General approval at the degree level of the proposed program, the program must be approved in advance by WSCUC.

If the joint degree program is also the first degree program at a specific level for one or more of the institutions, the change is considered structural in nature and will require review by the Structural Change Committee.

If one of the partnering institutions is on sanction with WSCUC, any new program, including a joint degree program, must be approved through the substantive change process. The Committee will decide whether a site visit is necessary during the review of the substantive change proposal.

If a WSCUC-accredited institution is planning to offer a joint degree program with an institution accredited by another regional accrediting agency, prior approval is not required as long as a) the WSCUC member institution has the required level of degree-granting approval for the degree being offered and b) 50 percent or more of the program is not being offered at a new site (outside of the partnering institutions' campuses) or via distance education.

The proposal for a joint degree program must be jointly developed by the partnering institutions and submitted by the institutional partner that does not have General degree-granting approval at the degree level being proposed or does not have a previous history of delivering programs in a particular modality or academic discipline. In addition, the institution must provide information concerning the support to be provided by the other degree-granting institution and an assessment of the impact the program will have on that institution. Representatives of each of the respective institutions are expected to be present for the conference call at the time the Committee reviews the proposal.

Institutions are encouraged to contact their WSCUC staff liaison with questions regarding proposed joint degree programs. Also, they are urged to review Commission expectations regarding academic programs and degree requirements by consulting WSCUC's Policy on Joint Degrees Offered Collaboratively by Two or More Institutions.

## **DUAL DEGREE PROGRAM**

A dual degree program is offered collaboratively by two or more institutions and leads to the award of a separate degree from each of the participating institutions.

Dual degree programs require prior approval if:

- The partner institution(s) is not accredited by a DOE-recognized accrediting agency; or
- Either institution is not authorized to offer programs at the requisite degree level without seeking prior substantive change approval.

If the program represents a new degree level for either institution, the change is considered a structural change.

If one of the partnering institutions is on sanction with WSCUC, any new program, including a dual degree program, must be approved through the substantive change process. The Committee will decide whether a site visit is necessary during the review of the substantive change proposal.

All dual degree programs must comply with WSCUC's policy on Dual Degree Programs Offered Collaboratively by Two or More Institutions, available in the Document Library on the WSCUC website.

### **DURATION: Change in Length of Degree Program**

Duration refers to a substantial change (typically 25 percent or more) in the number of clock or credit hours awarded for successful completion of a program or in its overall length. If the proposed changes would result in a significantly different program, a substantive change review may be required.

### **AGREEMENTS WITH UNACCREDITED ENTITIES**

Federal regulations require that new degree programs, more than 25 percent of which (in any modality) will be delivered under contract with an institution or organization not certified to participate in title IV, HEA programs, may require staff review or substantive change approval prior to implementation. Institutions considering this kind of arrangement should review WSCUC's Policy on Agreements with Unaccredited Entities and the related Guidelines for Good Practice.

### **FAST TRACK AUTHORIZATION**

WSCUC offers Fast Track Authorization, which provides an expedited process for reviewing programs of a particular modality or degree level. To be granted authorization, institutions must demonstrate the capacity to design, deliver, and evaluate programs in the modality or at the level requested. Once granted Fast Track Authorization, institutions may submit abbreviated proposals that are reviewed by the WSCUC staff within 30 days.

#### **Categories of Fast Track Authorization**

Institutions may request Fast Track Authorization for:

- Distance education programs
- International degree granting locations
- Bachelor's or master's degree programs (for institution that do not have General or Specified degree granting authority at those degree levels)

A separate authorization is required for each type of approval. When applying for Fast Track, a Fast Track Authorization proposal is submitted simultaneously with a program or location proposal for the type of authorization being requested.

#### **Criteria for Fast Track Authorization**

The Fast Track Authorization process is available to institutions that:

- Have been successful in implementing programs or locations at the degree level and/or type for which they are seeking authorization. The institution, at a minimum, must have received three substantive change approvals for the modality or degree level for which they are seeking authorization, and the resulting programs or locations must that have been in operation for at least a year.
- Do not have any resource or capacity issues that affect their eligibility for this authorization
- Have consulted and received approval from the WSCUC staff liaison before applying for authorization.
- Have been accredited or reaccredited in its last comprehensive review without a sanction being imposed and without encountering serious problems that affect the quality of off-campus and/or distance education programs

Note that a change of ownership or control during the authorization period may require a new Fast Track Authorization application and approval by the Substantive Change Committee.

#### **Review Process**

Once Fast Track Authorization has been granted, the institution submits expedited proposals for programs within the scope of the authorization to WSCUC for staff review prior to program implementation. The proposal is reviewed by WSCUC staff and the institution is notified of the outcome within 30 days. No further Commission approval is required.

In cases where proposals raise questions about programs falling outside the approved scope of the authorization, or where an institution's accreditation status has changed (i.e., placed on sanction), the WSCUC staff may request additional information and/or refer the proposal to the Substantive Change Committee for additional review.

An application and fee must be submitted to the WSCUC office before a proposal will be reviewed. Please refer to the Document Library on the WSCUC website for the Schedule of Dues and Fees.

### Renewing a Fast Track Authorization

Before the five-year authorization period has expired, an institution may submit a proposal to renew the authorization. The proposal to renew Fast Track must emphasize the lessons learned from the evaluation of several programs implemented during the previous authorization period and include updated documentation, assurances of continued financial resources (as demonstrated by budget projections), and a renewed plan for educational effectiveness.

### Expedited Review for Change of Modality Only

Institutions planning only to convert **existing** face-to-face programs to distance education programs may apply for the expedited process for Change of Modality. Institutions are eligible for this process if:

- The institution has had three or more substantive change approvals for distance education programs
- These programs have been in operation for at least one year
- The institution receives the recommendation of its WSCUC staff liaison

This is similar to the Fast Track process, except that institutions will not be required to submit a full proposal requesting authorization. To apply, they must submit the Fast Track Modality Change Application. Once the authorization is granted, proposals will be reviewed by the WSCUC staff within 30 days. There is no expiration date for this type of authorization.

This authorization does not apply to:

- international programs
- new degree programs that are not already offered on-campus or at another approved off-campus location
- doctoral level programs, unless the institution has General doctoral degree level approval

Contact the substantive change staff if you have questions about your institution's eligibility for this process.

## Changes Requiring Structural Change Review

Some changes reach beyond a particular program or location and affect the institution as a whole. These structural changes require the following steps:

- Review and interim approval by the Substantive Change Committee
- A pre-implementation site visit (unless waived)
- Review by the Structural Change Committee of the Commission
- Approval by the Commission
- Follow-up site visit six months to one year after implementation (as applicable)

Note that structural change reviews generally take at least two months longer to complete than reviews conducted only by the Substantive Change Committee. Institutions should submit the Substantive Change Application Form and fee nine months to one year before planning to implement the change and allow for at least six months between the proposal due date and final Commission approval.

Note that structural changes for a change of ownership or control will only be considered by the Structural Change Committee and the full Commission at one of the three in-person Commission meetings each year (February, June and November), unless under exceptional circumstances. It is important to keep this timing in mind when scheduling the review.

### FIRST DEGREE AT A DEGREE LEVEL

The first degree program offered at a level at which the institution does not already offer degrees (associate, bachelor's, master's, professional doctorate, research doctorate) is considered to be a structural change. Professional doctorates and research doctorates are considered distinct degree levels; the first degree at each level requires structural change review. Joint degree programs are subject to structural change review if the degree level offered is new for one of the institutions.

In addition, the first doctoral program at an institution is subject to a follow-up review in the fifth year of the program. See the First Doctoral Degree Fifth Year Review Guidelines in the document library on the WSCUC website for more information.

### FIRST COMPETENCY-BASED OR DIRECT ASSESSMENT DEGREE PROGRAM

The first competency-based or direct assessment degree program at an institution is considered a structural change and is subject to a pre-implementation site visit as well as a follow-up site visit one year after the program launches.

### ORGANIZATIONAL CHANGE: Mission, Legal Status, or Control

Organizational changes involve alteration in legal status, control, or mission. Because such changes affect the institution in its entirety, they are considered structural.

- A **change in mission** is defined as a significant change to the objectives of the institution.
- A **change in legal status or form of control of the institution** is defined as a change in ownership, control, sponsorship, or affiliation, e.g., a merger with another institution or organization. A change in ownership or control of a parent entity that owns a WSCUC-accredited institution also constitutes a structural change.

When an unaccredited institution merges with a WSCUC-accredited institution, accreditation is not automatic. Institutions are strongly encouraged to review WSCUC's policy on Levels of Review for Proposed Changes in Mission, Legal Status, Ownership, or Control and consult with their WSCUC staff liaison to discuss the process and timeline for a change of this nature. Such changes may be so

extensive that they warrant a fuller review because they could result in an entirely new institution. In such cases, the WSCUC staff or the Substantive Change Committee could require the institution to undergo a comprehensive review or be reviewed through the Eligibility process.

In accordance with WSCUC's policy on Institutions with Related Entities, institutions planning a change in ownership or control involving a **related entity**<sup>1</sup> must respond to the elements listed in the Change in Ownership or Control proposal template and submit the following information:

- An **Acquisition Plan** that shows how the institution, under the new owner, will continue to meet all eligibility requirements and accreditation standards. Also required: relevant filings with the U.S. Securities and Exchange Commission (if applicable). The principals of the acquiring entity must demonstrate the experience and expertise necessary to operate the institution and, if they operate other institutions, full compliance with applicable laws, rules, and regulations.
- A **Description of New Initiatives** that are planned or anticipated for the first year of the new ownership if they could materially affect the mission, plans, and/or operations of the institution (such as restructuring management, increasing enrollment, or adding several new programs or locations). If such changes could be considered substantive (involving change of mission, for example), the change of ownership application must address them.
- A **Description of Finances** showing how the viability of the related entity and the institution could be affected by the change of ownership and how both partners plan to meet upcoming financial needs.
- A completed **Certification of Related Entity** form found in the Document Library on the WSCUC website.

The Commission will protect the confidential nature of all information submitted by institutions or by related entities, except as otherwise required by law.

### Required Documents

In order to conduct a thorough review, the Commission requires full access to drafts of governing board-approved documents, as appropriate to each change category, such as:

1. Documents that establish the legal definition and status of both the current and the proposed ownership and governance entities.
2. Documents that describe the relationship between the institution's ownership entity and a) its governing board and b) any other legally related entities, in order to ensure compliance with WSCUC's expectation for an independent and qualified governing board. These would include the bylaws or the equivalent organizing document and a list of the proposed board members with their affiliations and qualifications.
3. If the institution or a related entity of the institution is for-profit, a description of how the proposed ownership will be held (as stock, shares of ownership, or other equity types) and of the relationship between ownership interest and voting authority on the institution's governing body.
4. A description of how a proposed transfer of ownership or control will impact the exercise of institutional control, authority, and governance.

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<sup>1</sup> An institution is considered to have a related entity if its governing board shares decision-making responsibility with one or more non-accredited entities concerning functions and operations of finance, planning, governance, budget and approval processes, recruitment, information systems, or employee compensation.

5. Other documents specified in the current substantive change template for a change of mission/ownership/control.
6. Documents that describe the rationale for a change of mission and that provide an analysis of the impact of that change on academic structures, faculty and staff members, student body composition, enrollment, outcomes, allocation of resources, and related dimensions of the organization.

### WSCUC Classifications for Institutional Types

Postsecondary institutions are generally categorized as public; private nonprofit; or for-profit.

Nonprofit institutions have traditionally been formed as nonprofit corporations under the applicable state corporation laws. For-profit institutions have traditionally been formed as for-profit corporations. Recently, with the addition of the limited liability laws, educational entities are being formed as limited liability companies or LLCs. An institution that is formed as an LLC will ordinarily be classified as a for-profit.

However, under limited circumstances, a California LLC may be classified by WSCUC as a nonprofit entity. The criteria for such classification are as follows: (1) all of the members/owners of the LLC must have 501(c)(3) status from the IRS or 23701d status from the California Franchise Tax Board; (2) the Articles of Organization must (a) prohibit the sale and transfer of any ownership interest to any entity that does not have 501(c)(3) or 23701d tax exempt status and to any individual, and (b) include a charitable dedication clause and dissolution clause, consistent with those required from 501(c)(3) and 23701d organizations; (3) the institution must have approval from the State Board of Equalization for an exemption from property taxes; and (4) the institution must agree (a) not to sell its assets to or merge into any organization that is not a 501(c)(3) or 23701d organization without the approval of the California Attorney General, and (b) before the institution makes any changes that affect its continuing to meet any of these criteria, to seek approval from WSCUC.

## ORGANIZATIONAL CHANGE: Accreditation of An Unaccredited Entity Through Affiliation with An Accredited Institution

This section applies to proposals in which an entity that is not WSCUC accredited seeks to create a formal relationship with an accredited institution with the stated intent of the unaccredited entity evolving within the accredited institution to the point of becoming separately accreditable under WSCUC policies. The targeted time to achieve the goal of separate accreditation may be uncertain or addressed at an undefined future date. To be considered for Commission approval, the entity seeking to affiliate with the accredited institution must represent a coherent educational program or organizational configuration that can be envisioned as potentially becoming a stand-alone institution in compliance with WSCUC's policy on Accreditation of Separately Accreditable Units.

For the purposes of this section, the proposed affiliation will be referred to as an "incubation" relationship. The concept of incubation applies to scenarios such as<sup>2</sup>:

- A new entity with robust resources that would likely achieve WSCUC accreditation on its own once it has graduates from a program but wishes to move more quickly into the category of an operational higher education institution

<sup>2</sup> In such cases where a segment or operational unit of an existing accredited institution intends to create a separate identity and/or organizational structure apart from the parent institution, such as an online division or an adult-serving institution, the emerging entity must apply for its own accreditation following the process outlined in the How to Become Accredited Manual.

- An innovative or experimental educational entity that desires a period of time as an actual part of the higher education sector to demonstrate whether it is viable on its own

In view of the fact that the implications of such a relationship extend beyond those of a substantive change for a new program, this section anticipates the multiple areas to be reviewed, over an extended period of time, in preparation for a sequence of actions by the full Commission.

### Scope of Review

Substantive change proposals are expected to address the following:

1. Submitting Entity: The institution that holds WSCUC accreditation will prepare and submit the proposal to enter into an incubation relationship, with the full and informed collaboration of the unaccredited entity. This is essential in view of the fact that WSCUC has jurisdiction only over the accredited institution. This institution, through its continuous supervision of the unaccredited entity as an organic component of its own organization, is expected to ensure its compliance with WSCUC requirements at each stage of the process.
2. Planning: Planning documents, including a signed MOU, should address the full range of the envisioned relationship, including:
  - a. Purposes: The proposal must express how the relationship harmonizes with and furthers the mission of each entity. To this end, it should specify what each party seeks to accomplish by the collaborative agreement in terms of the intended outcomes – financial (such as return to investors for a for-profit institution), academic, and organizational. These intended outcomes must comply at each stage with WSCUC Standards for institutional accreditation.
  - b. Governance and Control: The application must include a precise statement of the roles of each entity in both the immediate and the eventual governance structures, with specific attention to defining the controlling interests and ensuring compliance with WSCUC criteria for independent governing boards. It should be clear that the board of the accredited entity exercises sufficient authority and autonomy over the resulting institution to ensure its compliance with WSCUC Standards, with particular attention to oversight of curriculum, resource allocation, and institutional identity. The entity being incubated should have its own governance structure ready to become operational at the time it seeks to achieve separate accreditation. [See WSCUC’S policy on Independent Governing Boards.]
  - c. Academic Services: The proposal must include a thorough delineation of shared or specified academic responsibilities, including ensuring that the accredited entity:
    - i. Is responsible for transcripts and records, financial aid, admissions and registration processes and the criteria by which these decisions will be made, and is the entity into which students register.
    - ii. Approves student handbooks, policies, and complaint processes, and determines whether any documents apply differentially to each entity.
    - iii. Determines faculty policies, workloads, roles and responsibilities, terms of employment and awards of tenure or similar designations.
 Such delineations must be sufficiently comprehensive to cover all aspects of the incubated unit.
  - d. Terms of Separation: The proposal must address at what point, and by what criteria, the “incubated” entity will be regarded as ready to seek Eligibility and separate accreditation, including a timeline for the anticipated length of the incubation and the eventual separation. Since the governing bodies of each entity will make these

decisions, both entities' governing boards must formally approve this aspect of the proposal. The following elements must be addressed:

- i. Financial Agreements: Specify how tuition revenues and debt obligations will be addressed by each entity; how faculty and staff salaries will be transitioned at the time of separation; and how shared assets, including intellectual properties, will be distributed.
- ii. Enrollment and Teach-outs: Specify how students' enrollment status will be protected during a transition away from the joint entity. Describe the conditions under which the new entity will enroll its own students and issue diplomas and transcripts in its own name without reference to the name of the parent entity. If any programs offered under the auspices of the joint entity will be discontinued, describe the teach-out agreements that will be implemented at the time of the closure of the program.
- iii. Assets and Resources: Describe in detail the assets, resources, and liabilities that will be brought to the accredited entity by the agreement and how values will be assigned and assets distributed to each entity upon the separation.
- iv. State Authorization: If the institution is located in California, stipulate that the unaccredited entity must seek and obtain its own authorization from California's Bureau of Private Postsecondary Education (BPPE) prior to becoming a separately accredited institution.
- v. Title IV Program Participation: Stipulate that the unaccredited entity must seek and obtain its own federal OPEID number and Program Participation Agreement (PPA) for title IV purposes prior to recognition as an accredited institution, unless the institution elects not to participate in title IV. The newly accredited entity must be prepared at that time to manage title IV obligations or to delegate them to a qualified contractor.

3. Legal Review:

All memoranda of understanding and other founding documents will be subject to legal review as determined by WSCUC staff to ensure that the resulting organization complies fully with WSCUC policies and criteria in such areas as governance, accountability, and quality control. The costs for such review will be invoiced to the applicant institution in addition to other specified fees for the level of review required. Both parties must also specify in writing how they will address any conflicts that may entail legal counsel in terms of the mode and venue for conflict resolution.

4. Protocol for Review:

A WSCUC-accredited institution proposing to enter into a partnership with an unaccredited entity for the purpose of incubating the unaccredited entity will be subject to a review by the WSCUC staff, the Substantive Change Committee, and the Structural Change Committee of the WSCUC Commission. To begin consideration, WSCUC staff will examine the proposal and supporting documentation to determine the appropriate review procedure to be followed. A recommendation for Commission action will be made only when both the staff and the Substantive Change Committee have found that the proposed change sufficiently meets the WSCUC standards to potentially be considered for approval. A site visit by a Substantive Change Committee panel will likely be required as part of the review. This recommendation is referred to the Commission's Structural Change Committee for review and action and subsequently referred to the full Commission for final approval. The arrangement will be evaluated at the time of the next comprehensive review or within six years after implementation.

WSCUC-accredited institutions considering such an arrangement should consult with their staff liaison before submitting a proposal under this section.

## Noncompliance with Substantive Change Policies

Candidate and accredited institutions are responsible for developing internal procedures to ensure compliance with the Commission's substantive change policies and procedures, and to guarantee that new sites or programs or other changes are not initiated without obtaining the necessary approval.

Such off-campus and/or distance education programs or sites are eligible for federal financial aid only if they are recognized and approved through the Commission's process.

If the Commission determines that a site or program has been initiated without obtaining the necessary approval, **the institution will be required to cease enrollments at that site or for that program until the substantive change approval(s) has been obtained.**

When noncompliance occurs, the president of the institution will be notified and the institution will be required to submit a response with the following information, in addition to the relevant substantive change proposal(s), at the time of its substantive change review:

- Clarification of the circumstances in which the change was implemented prior to receiving the requisite substantive change approval(s).
- Audit of the institution's off-campus and distance education programs. Additional programs/locations that are found to be in noncompliance must be reported and scheduled for review.
- Identification of the processes in place or to be put in place to ensure that all future programs/locations receive necessary approvals prior to implementation.

After the Substantive Change Committee reviews this information, the matter will be forwarded to the Commission to determine if a sanction may be imposed for violation of the institution's responsibilities under Standard One, Institutional Integrity (CFR 1.8).

# Section Two:

## Substantive Change Review Procedures

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This section provides detailed information on the substantive change proposal development and review process.

### **STEP 1: Determine Whether a Change Is Considered Substantive**

Section I: Substantive Change Policies describes in detail the categories and definitions of substantive changes requiring approval before implementation. Determining the type of change is very important, as it is the basis for how the institution navigates the substantive change process. Institutions are also encouraged to contact their WSCUC staff liaison and/or the Substantive Change staff for guidance.

### **STEP 2: Submit Application and Fee**

Once it is determined that a proposed change requires approval, the Accreditation Liaison Officer (ALO) submits the Substantive Change Application Form and appropriate fee (found in the Dues and Fees Schedule in the Document Library on the WSCUC website). The application, signed by the institution's ALO to ensure that the proposed change is supported by the institution, should be submitted to WSCUC at least six months prior to the anticipated implementation date to assure adequate time to complete the review and approval process.

Reviews are scheduled on a first-come, first-served basis. Receipt of the application and fee will reserve a place on the Substantive Change Committee's review calendar, which frequently fills up six months in advance. Applications will not be processed until payment is received. The Substantive Change Committee will consider no more than two proposals per month from one institution.

#### **Review Time Frame**

It is important to consider the full time frame for the review process. Note that the proposed change must receive full approval from the Commission before an institution may implement the change. This approval usually occurs within one month of an Interim Approval recommendation from the Substantive Change Committee. This time frame may vary, however, based on the complexity of the proposed change. Structural changes, and those requiring site visits, take longer to complete. The Substantive Change Committee and the Commission meet monthly in person or by conference call to take action on substantive changes. Structural changes for a change of ownership or control will only be considered by the Structural Change Committee and the full Commission at one of the three in-person Commission meetings each year (February, June and November), unless under exceptional circumstances.

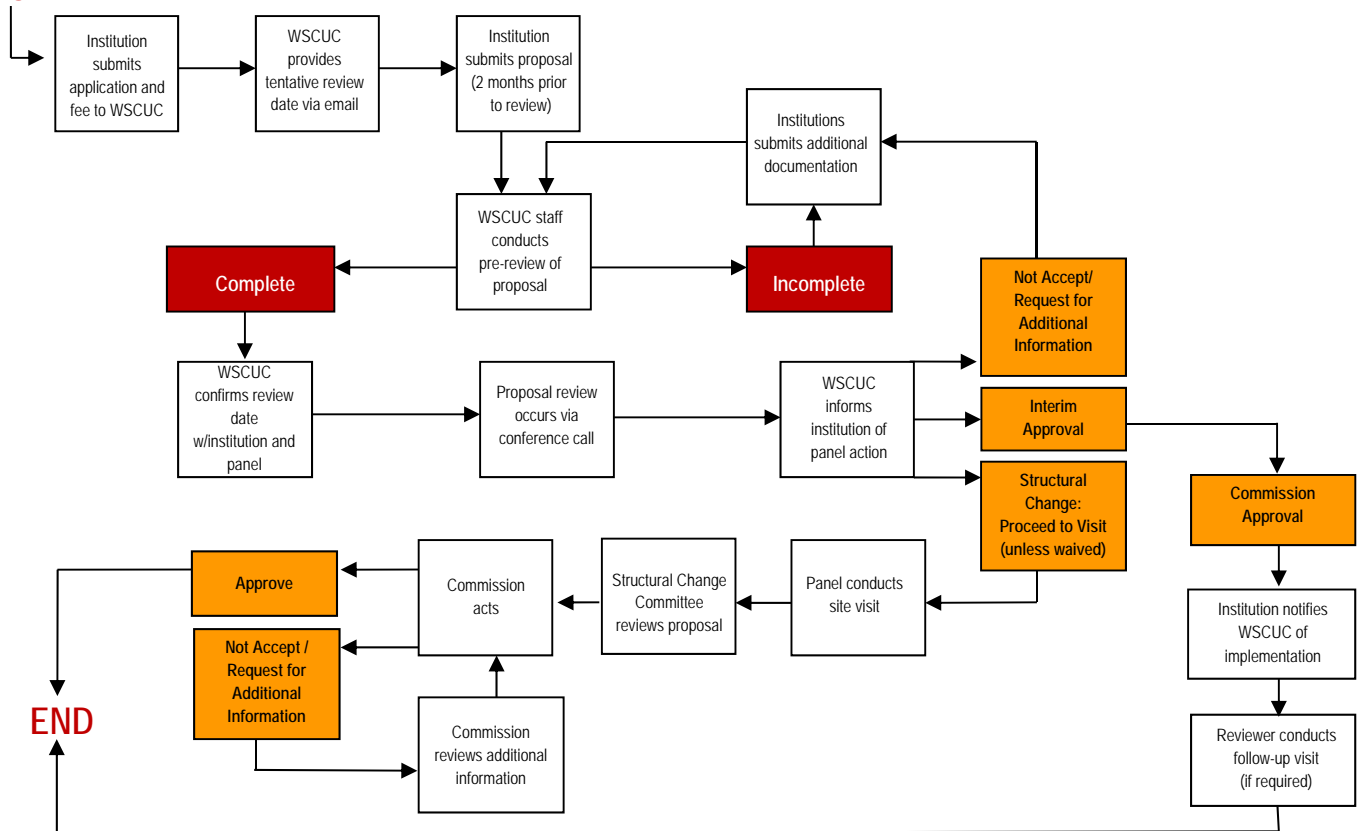
### **STEP 3: Develop the Proposal**

After submitting the application form and fee, the ALO will receive an email confirmation from the WSCUC staff. This email will include:

- The specific proposal template to complete for the type of change being proposed
- Instructions on completing and submitting the proposal
- The proposal due date (typically two months prior to the Substantive Change Committee review date)
- The tentative date of the Substantive Change Committee review

## Substantive Change Process Flow Diagram

START



The ALO is responsible for disseminating this information to the institutional representatives drafting the proposal and for reviewing the proposal for completeness and accuracy prior to submission to WSCUC.

Several templates have been developed to correspond specifically to each type of substantive change. You will be informed of the template that you are to use to complete the proposal. Please follow the instructions included in the template and respond to each question in the template. Proposals may be no longer than 10,000 words, not including attachments. Appendices may be uploaded with the proposal.

WSCUC is no longer using Live Text for submission of substantive change proposals. All documents must be uploaded through a designated folder in Box.com, an online file sharing and cloud content management service. Institutions must create a free Box.com account for uploading files for WSCUC review. Contact the substantive change staff for more information.

Proposals that the Committee has found to be of high quality are:

- Clearly written and responsive to each question
- Linked to institutional mission and objectives
- Supported by data and evidence, e.g., market analysis
- Show alignment between program and course learning outcomes

- Based on planning processes that include key academic faculty members, staff members, and administrators
- Illustrative of the financial capacity of the institution to sustain the program or location, i.e., have complete and detailed budgets

Appendix Four contains a list of common issues in substantive change proposals to help guide proposal development.

### **Internal Review**

Before submitting the proposal to WSCUC, the ALO is expected to conduct a thorough review of the entire proposal to ensure that all required elements of the assigned template have been completed, to check for spelling and grammatical errors, and to ensure consistency in formatting.

All proposals must also go through the appropriate internal institutional approval process. Prior to submission, proposals must have obtained all relevant internal approvals – for example, from the president or chancellor, the chief academic officer, the curriculum committee, the faculty senate, the governing board, and/or the system office — in keeping with the institution’s quality assurance processes. The institution must also demonstrate that faculty members have been appropriately involved in developing and approving the program, especially those who will be responsible for its delivery.

### **Joint Degree Programs**

In the case of a joint degree programs, all participating institutions are expected to have approved the proposal prior to submission.

## **STEP 4: Submit the Proposal**

The proposal must be submitted to WSCUC by the due date assigned, typically **60 days in advance of the scheduled review** with the Substantive Change Committee. Proposals submitted after the due date may be rescheduled to another month. A cancellation or rescheduling fee will be applied when an institution requests to re-schedule a confirmed review less than 60 days prior to the review date. (Refer to the Schedule of Dues and Fees for the re-scheduling fee.)

### **Preliminary Review by the WSCUC Staff**

Once the proposal is submitted, WSCUC staff members will review the proposal and give the institution the opportunity to provide missing information and to clarify any aspects of the proposal that are not clear. The WSCUC staff will send the ALO an email with instructions for submitting additional information. The institution will be given one week to revise the proposal. Upon receipt of the revisions, the proposal will be forwarded to the Substantive Change Committee for review.

Note that the WSCUC staff, along with the Substantive Change Committee, reserves the right to remove any proposal from its docket if the submission is excessively incomplete. The preliminary review is designed to assist the institution in avoiding a Not Accept action by the Committee.

## **STEP 5: Participate in the Review via Conference Call**

The WSCUC staff will send the ALO an email confirming the dial-in information and the date and time of the review at least one month prior to the call. The ALO is expected to distribute this information to all institutional representatives participating in the call and to submit the names and titles of those individuals to the WSCUC office.

**Table 2: Timeline for Marketing and Implementing New Programs**

<b>Before Interim Approval (After application and fee are received by WSCUC)</b>
Advertise a new degree program or site, with notice “pending WSCUC approval”
Receive applications for a new degree program—but not make admit decisions—with notice “pending WSCUC approval”
<b>After Interim Approval</b>
Advertise the program or site, with notice “pending WSCUC approval”
Receive applications from students
Admit and enroll students, with notice “pending WSCUC approval”
<b>After Final Approval from the Commission</b>
Begin offering courses

All substantive change proposals are reviewed by a two- or three-person panel drawn from the Substantive Change Committee. The committee is comprised of peers from within the WSCUC region who are chosen based on their experience in higher education and in substantive change matters. The panel reviews and assesses each proposal using a scoring rubric, which is compiled and sent to the other panelists prior to the conference call. The panel uses these preliminary evaluations to guide the discussion with the institution during the conference call.

Each proposal is assigned a first reader on the Substantive Change Committee panel, who facilitates the discussion during the call, although all panel members are likely to ask questions. Institutional representatives are expected to be prepared to address all educational effectiveness and capacity issues relating to their proposal.

### Preparing for the Committee Review

Institutional representatives can prepare for the Committee discussion by reviewing their proposal in detail. The Committee panel often asks questions about:

- The planning and approval process
- Involvement of key faculty members
- Support for, and training in, the use of technology (especially for online programs)
- Impact upon the broader institution
- Learning outcomes, assessment plans, and program review
- Student support services
- Financial viability
- Faculty and staff resources and workload

Discussing the proposal with the panel presents an opportunity for the institution to provide additional analysis and interpretation beyond what is presented in the proposal. The Substantive Change Committee is particularly interested in the institution’s capacity to sustain the quality of the program, site, or organizational change, including plans to assess student learning outcomes.

### During the Call

On the scheduled date of the review, institutional representatives will participate in a 30- to 45-minute discussion by conference call with the panel and a WSCUC staff person. The Committee has found it particularly helpful to speak with a small institutional team that represents various levels of institutional responsibility for the proposed change. This group may include the ALO and a representative from the provost’s or dean’s office, the program director, and a key faculty member. Institutions are encouraged to include five to seven representatives.

## **STEP 6: Receive Notification from WSCUC**

Typically, the WSCUC staff person on the call will inform the ALO by phone of the Committee's action within 24 hours. The panel will take one of the following actions:

1. Interim Approval
2. Defer action pending receipt of additional information
3. Proceed to Site Visit (if applicable)
4. Refer to Commission
5. Not Accept

### **Interim Approval**

Within 10 business days, the WSCUC staff person will prepare a formal action report on behalf of the Committee citing commendations and recommendations from the panel's review. The institution is expected to address recommendations cited in the action report, typically by the time of the next site visit. Progress on recommendations should be addressed in subsequent substantive change proposals even if the proposed change is for a different discipline, degree level, or modality.

Once a proposal receives Interim Approval from the Substantive Change Committee, it will be forwarded to the Commission for Final Approval. The Commission meets in person three times per year (February, June and November). In other months, the Executive Committee of the Commission meets by conference call to take final action on substantive change proposals via consent agenda. The Executive Committee may pull a proposal from the consent agenda for consideration by the full Commission at its discretion.

In all cases, Final Approval must be granted by the Commission before any proposed change may be implemented. The institution will be notified by email when Final Approval has been granted or denied.

### **Defer Action**

Occasionally, a panel will defer action on a proposal pending receipt of additional information. This option is provided when the panel has identified a few items that are readily available from the institution but are missing from the proposal. Institutions are generally given one to two weeks to provide the information.

### **Proceed to Site Visit (for Structural Changes)**

If the proposed change requires a pre-implementation site visit, the WSCUC staff will send the institution an action letter on behalf of the review panel within 10 days. This letter will outline expectations for the visit process and specify documents the visit team may wish to review in advance of, or at the time of, the site visit, as well as individuals with whom the team may wish to meet. The site visit will be coordinated by the WSCUC staff, the ALO, and the visit team.

The review panel for a change of ownership or control, in consultation with the WSCUC staff liaison, may require that a confidential email account be made available to specific constituencies on campus (i.e. faculty or staff) in advance of the visit. The account will be used to gather input on narrowly defined issues related specifically to the change under consideration. The action letter from WSCUC staff will outline the requirement for the email account and identify the issues open for comment.

For more information on the site visit, see Section III of this manual.

### **Refer to Commission (for Structural Changes)**

In certain circumstances, the Substantive Change Committee may choose to waive the site visit requirement and refer the proposal to the Commission's Structural Change Committee for review. In such cases, the institution will receive an action letter from the WSCUC staff within 10 days on behalf of the panel outlining next steps.

The Substantive Change Committee also reserves the right to recommend that any proposal under consideration be reviewed by the Structural Change Committee for further analysis if it finds that an additional review is warranted or that it has insufficient information to grant Interim Approval.

### **Not Accept—Revising a Proposal**

The Substantive Change Committee may determine that a proposed change is not sufficiently well developed or lacks adequate detail to be forwarded to the Commission for approval, in which case the Committee will take a Not Accept action. The institution will receive from WSCUC, on behalf of the review panel, an action letter that specifies the reasons approval was withheld, citing the relevant Criteria for Review in the Standards of Accreditation, the specific issues that need to be addressed in a resubmission, and information on the steps to resubmit the proposal if the institution chooses to do so.

The revised proposal needs only address the specific issues cited in the action letter and may be no more than 5,000 words in length, not including attachments. The institution has one year to resubmit; after one year, a new proposal must be submitted for consideration.

A resubmission fee is due prior to consideration of the revised proposal. Please consult the current Schedule of Dues and Fees. Upon receipt of the fee, a Box.com folder will be provided to upload the proposal.

Typically, a resubmission is reviewed by the first reader on the review panel and the WSCUC staff liaison in a 30 minute conference call. The institution is generally not invited to participate in the call. However, the panel may request another review by the entire panel and/or the participation of the institution via conference call if it deems these steps to be necessary. The institution is responsible for addressing any requests for additional information or conducting any other follow-up requested.

If the proposal meets the expectations of the review panel, it will be forwarded to the Commission for consideration (or a site visit will be scheduled, if a structural change).

If, following the receipt and review of additional information, the proposal is still not ready for Commission review, the Committee will take a Not Accept action and the institution may be invited to resubmit again.

### **Appeal of Committee Decisions**

If a proposal is not accepted, the institution may choose to ask the panel to reconsider its decision, by way of a written communication sent within 30 days of receiving the committee's decision. The institution's communication should contain well-documented arguments for reconsideration.

The panel that reviewed the institution's proposal will review the request and make a decision within 30 days of receipt of the request. This decision will be communicated promptly to the institution. If the panel does not reverse its initial decision, within 30 days the institution may ask in writing that the Commission's Executive Committee address the matter.

The Executive Committee will consider the request within 60 days of receipt and will communicate its decision promptly. The Executive Committee's decision is final.

### **STEP 7: Host a Site Visit (for Structural Changes)**

If the Substantive Change Committee acts to proceed to a site visit, the WSCUC staff will work with the ALO to determine a date for the visit, which typically lasts one day. The visit usually occurs within 30 to 60 days of the panel's decision. The visit will be conducted by one or two members of the Substantive Change panel that reviewed the proposal and is designed to gain more detailed information about the proposed change and its impact on the institution. The agenda for the visit may include meetings with faculty members, administrators, students, and others on campus. The ALO will work with the visit team to finalize the agenda and arrange for the visitors' accommodations.

Within three weeks of the visit, the team will submit a visit report to WSCUC, which will be forwarded to the institution for correction of errors of fact. The institution will have one week to respond. The visit team will then review the changes and revise the report as appropriate. At this point, the institution may submit a written response to the visit report which will become part of the review materials for the proposal. The original proposal, the visit report, and the institutional response (if applicable) will be forwarded to the Structural Change Committee for its consideration.

Evaluator expenses and the applicable site visit fee will be charged to the institution. Please refer to the Document Library on the WSCUC website for the current Schedule of Dues and Fees. Note that flight times over eight hours in length may be booked as business class.

See Section III for more information on site visits.

### **STEP 8: Receive Final Approval**

The Commission must approve all substantive changes, including structural changes. **In all cases, Final Approval must be granted by the Commission before any proposed change may be implemented.** An institution may not begin offering courses for a new program prior to Commission approval. However, if the Structural Change Committee has acted favorably, the institution may advertise and admit students to the program with the disclaimer that the program is "pending WSCUC approval." See Table 2: Timeline for Marketing and Implementing New Programs for more information.

#### **Substantive Changes**

Once a proposal receives Interim Approval from the Substantive Change Committee, it will be forwarded to the Commission on a consent agenda for Final Approval. The Commission meets monthly, either in person or by conference call, to take final action on substantive change proposals. The institution will be notified by email when Final Approval has been granted.

#### **Structural Changes**

A structural change proposal, along with the site visit report, the institution's response (if applicable) and the Substantive Change Committee's recommendation, will be reviewed by a panel of the Commission's Structural Change Committee. Institutional representatives do not normally participate in conference call or in-person meetings of the Structural Change Committee except unless requested by the Committee.

The proposal, if approved by the Structural Change Committee, will be forwarded to the Commission for Final Approval (either at one of the three in-person meetings each year or by conference call). The Commission usually approves recommendations of the Structural Change Committee within two weeks and informs the institution by Commission action letter. The letter

and the visit report will be posted on the WSCUC website. If the institution chooses to provide a written response to the visit report, the response will be considered by the Structural Change Committee and posted on the WSCUC website.

If the proposal is Not Accepted by the Structural Change Committee, the institution will receive an action letter specifying the reasons for the decision, citing the relevant Criteria for Review in the Standards of Accreditation, and, if appropriate, explaining how to resubmit the proposal if the institution chooses to do so.

## Revising a Proposal (if applicable)

If a proposal is not accepted by the Substantive Change Committee or Structural Change Committee, the institution may revise its proposal and provide supplementary information over the course of the next year. After one year, it must submit a new proposal for consideration.

Revised proposals are submitted through Box.com and may be no more than 5,000 words in length, not including attachments.

Revised proposals are reviewed by the WSCUC staff and one or more members of the panel that examined the original proposal to see if all requests and suggestions in the action letter have been addressed. A conference call with the institution may be necessary.

Requests for additional information may relate to:

- Financial resources and budget projections
- Educational effectiveness, including student learning outcomes, assessment plans, and program reviews
- Curriculum, including sequencing
- Faculty and staffing
- Memorandum of Understanding (the final signed copy is required)

The institution must pay a resubmission fee. Please consult the current Schedule of Dues and Fees.

## Notifying WSCUC of Implementation

Under Standard One, the institution is responsible for notifying WSCUC within 30 days of the implementation of a substantive change using the appropriate Implementation Form found in the Document Library or in the “Locations” tab of your institution’s listing in the Institution Directory (<http://www.wascsenior.org/institutions>) on the WSCUC website. Failure to notify WSCUC of the date of implementation of any new program or off-campus location within 30 days of the start date will result in the suspension of the program’s approval, the need to suspend enrollments, and a potential loss of financial aid for students enrolled in the program. Repeated noncompliance with this requirement could lead to a sanction of the entire institution under Standard One, CFR 1.8.

If the substantive change approved is for an off- campus and/or international site, the Program Implementation Form is used to trigger the scheduling of the six-month site visit (if required).

Institutions typically have two years from the date of Commission approval to implement the change. This time frame may be shorter for some structural changes, such as a change of ownership. If the change will be implemented after the approval timeframe, contact your WSCUC staff liaison to discuss whether the change will need to be re-approved.

# Section Three:

## Substantive Change Site Visits

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Site visits are required for certain types of substantive changes, based on U.S. Department of Education and WSCUC policy. This section outlines the two types: pre-implementation and post-implementation.

### Pre-implementation Site Visits

Pre-implementation site visits are required for most structural changes, including:

- First degree at a new degree level
- First competency-based or direct assessment degree program
- Change in mission, legal status, or form of ownership or control

These visits occur after a proposal has been reviewed by the Substantive Change Committee and must be completed before a proposal can receive Interim Approval and be forwarded to the Structural Change Committee.

#### Purpose and Scope

The primary purpose of a pre-implementation site visit is to assess how a proposed structural change will be implemented, to answer questions identified by the Substantive Change Committee, and to determine the overall impact of the change on the institution.

A review panel for a change of ownership or control, in consultation with the WSCUC staff liaison, may require a confidential email account be made available to specific constituencies on campus (i.e, faculty or staff) in advance of the visit. The account is used to gather input on narrowly defined issues related to the change at hand.

One or two members of the Substantive Change panel that reviewed the proposal will conduct the visit over one or two days.

Substantive change site visits are typically narrow in scope and cover issues determined in advance. During a visit, reviewers may:

- Meet with institutional representatives, faculty members, students, and third-party providers
- Observe teaching and learning spaces
- Learn more about the curriculum and assessment plans
- Evaluate the financial and administrative capacity to offer the program
- Seek additional information or perspectives

The visit typically occurs within 30 to 60 days following the Substantive Change Committee review. In some cases, the visit may include branch campuses that provide administrative support or oversight to a site.

Following the visit, the team will write a brief report, which will be forwarded to the institution for correction of errors of fact. The institution will have one week to respond and may provide a written response to the report that will become part of the review materials. The report will

include a recommendation to either a) forward the proposal and all related materials to the Structural Change Committee for review or b) not accept the proposal.

If the proposed change is granted Final Approval, the visit report, the institutional response (if applicable) and the Commission action letter granting approval will be posted on the WSCUC website.

Please refer to the Structural Change Site Visit Report Template found in the Document Library on the WSCUC website.

Pre-implementation site visits may be waived at the discretion of the WSCUC staff or the Substantive Change Committee.

### Expenses

Evaluator expenses and a site visit fee will be charged to the institution. Please refer to the Document Library on the WSCUC website for the current Schedule of Dues and Fees. Note that flight times over eight hours in length may be booked as business class.

### Post-implementation Site Visits

Some substantive changes may require post-implementation site visits including:

- **Off-campus sites** (within six months of establishment) if:
  - The institution has three or fewer additional locations;
  - Has not demonstrated a proven record of effective educational oversight of additional locations; or
  - Has been placed on sanction
- **International programs** (six months to one year after implementation). Visits must be conducted within:
  - Six months, if students enrolled in the program are eligible for, and will seek, U.S. federally funded financial aid.
  - One year, if a) the site is an institution's first location in a country (visits may sometimes be waived at the discretion of the Substantive Change Committee) and b) students are not eligible for, or will not seek, U.S. federally funded financial aid.
- **Changes in mission, legal status, or control** (within six months of implementation)
- **Visit requested by the Committee or Commission staff** for extenuating circumstances.

### Purpose and Scope

One of the primary purposes of a post-implementation visit is to verify that the new site has the personnel, facilities, and resources described in the substantive change proposal and that they are adequate to support the program(s) being offered. The Committee action letter or report approving the proposal will note that a site visit is required within a specified time period after the implementation of the change and will outline the issues to be evaluated. The institution will use the appropriate Implementation Form (available on the WSCUC website) to inform WSCUC that a change of ownership has been completed or that a program at an approved site or off-campus location has been started. The WSCUC staff will then contact the ALO to plan and schedule the visit.

In some cases, the visit may be included as part of the institution's comprehensive review if the Accreditation Visit is already scheduled to occur within one year of the start of the program. A post-implementation visit may also be combined with a scheduled Special Visit.

Whenever possible, one or two members of the Substantive Change Committee panel that oversaw the proposal review will conduct the site visit, which typically lasts one day.

Following the visit, the team will write a brief report, which will be reviewed by the WSCUC staff liaison and forwarded to the institution for correction of errors of fact. If the visit raises questions about compliance with WSCUC Standards or policies, it may be forwarded to the Commission for further action.

Please refer to the Follow-Up Site Visit Guidelines and Template on the WSCUC website for more information.

**Expenses**

Evaluator expenses and a site visit fee will be charged to the institution. Please refer to the Document Library on the WSCUC website for the current Schedule of Dues and Fees. Note that flight times over eight hours in length may be booked as business class.

# Section Four: Appendices

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## Appendix 1: Federal Regulations Concerning Substantive Change

U.S. Department of Education regulations require that accrediting agencies maintain adequate policies to ensure that any substantive change to the educational mission or program(s) of an institution does not adversely affect the capacity of the institution to continue to meet the accreditation standards of its region. Importantly, federal law mandates that accrediting agencies require institutions to obtain approval of the substantive change before it is included in the scope of the accreditation or pre-accreditation previously granted to the institution.

WSCUC's definition of substantive change is required to include at least the following types of changes, as defined in the Federal Register, volume 64, number 202, October 20, 1999:

- Any change in the established mission or objectives of the institution.
- Any change in the legal status, form of control, or ownership of the institution.
- The addition of courses or programs that represent a significant departure, in either content or method of delivery, from those that were offered when the agency last evaluated the institution.
- The addition of courses or programs that represent a significant departure from the existing offerings or educational programs, or method of delivery, from those that were offered when the agency last evaluated the institution.
- The addition of courses or programs at a degree or credential level different from that which is included in the institution's current accreditation or pre-accreditation.
- A change from clock hours to credit hours.
- A substantial increase or decrease in the number of clock or credit hours awarded for successful completion of a program.
- The establishment of an additional location geographically apart from the main campus at which the institution offers at least 50 percent of an educational program.
- The establishment of a new degree program, 25 percent or more of which will be delivered under contract with an institution or organization not certified to participate in title IV, HEA programs.
- The acquisition of any other institution or any program or location of another institution.
- The addition of a permanent location at a site at which the institution is conducting a teach-out for students of another institution that has ceased operating before all students have completed their program of study.

Additionally, federal regulations require regional accreditation substantive change policies to address: 1) distance education, 2) branch campuses, and 3) site visits related to substantive changes.

If the agency's accreditation of an institution enables the institution to seek eligibility to participate in title IV, HEA programs, the agency's procedures for the approval of an additional location (i.e. branch campuses or sites) must determine if the institution has the fiscal and administrative capacity to operate the additional location.

The agency's procedures must include a visit to additional locations if the institution has:

- A total of three or fewer additional locations;
- Not demonstrated a proven record of effective educational oversight of additional locations; or
- Been placed on Warning, Probation, or Show Cause by the agency.

The agency's procedures must also include effective mechanisms for conducting:

- Visits at reasonable intervals to institutions that operate more than three additional locations.
- Visits (at the agency's discretion) for ensuring that institutions which experience rapid growth in the number of additional locations maintain educational quality.

## Appendix 2: WSCUC Policies Related to Substantive Change

- Agreements with Unaccredited Entities
- Credit for Experiential Learning
- Credit Hour
- Degree Level Approval
- Dual Degrees Offered Collaboratively by Two or More Institutions
- Handbook of Accreditation (2013)
- Institutions with Related Entities
- Instruction in Languages Other than English
- Inter-Regional Accreditation
- Joint Degrees Offered Collaboratively by Two or More Institutions
- Levels of Review for Proposed Changes in Mission, Legal Status, Ownership, or Control
- Teach-out Plans and Agreements
- Schedule of Dues and Fees
- Substantive Change
- WSCUC Glossary (In the 2013 Handbook of Accreditation)

## Appendix 3: Resources, Applications, and Forms

The following documents relate to the substantive change process and may be found in the Document Library on the WSCUC website, [www.wascsenior.org](http://www.wascsenior.org), unless otherwise noted.

### Proposal Development and Submission Resources

- Guidelines for the Evaluation of Distance Education
- Substantive Change Proposal Templates (<http://www.wascsenior.org/subchangetemplates>)
- Substantive Change Sample Proposals (<http://www.wascsenior.org/samples>)
- WSCUCU Standards and CFRs Related to Substantive Change (<http://www.wascsenior.org/resources/subchange>)

### Site Visit Resources

- Structural Change Pre-Approval Site Visit Guide and Template
- Substantive Change Follow-up Site Visit Guide and Template

### Forms

- Change of Address Form for Off-campus Locations
- Fast Track Modality Change Application Form
- Implementation Form (Change Ownership or Control)
- Implementation Form (New Programs or Off-campus Sites)
- Substantive Change Application Form
- Substantive Change Expedited Review Application Form

## Appendix 4: Common Issues in Substantive Change Proposals

This list identifies the most commonly cited areas of revision in substantive change proposals. The first section lists issues commonly caught in the preliminary staff review done by WSCUC staff. Other sections identify common issues specific to undergraduate, graduate and distance education programs.

Sections where the issues appear in the proposal have been mapped to the two most commonly used proposal templates:

- New Degree Program (Assoc, Bach, Masters)
- Doctoral Program

Unless specified, the sections numbers refer to both templates. Where they differ, the first reference is to the New Degree Program template and the second reference is to the Doctoral Program template.

Relevant CFRs for commonly identified issues have also been included.

### Preliminary Reviews

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WSCUC staff conduct a preliminary review of all substantive change proposals before they are forwarded to the review panel. This list identifies the most common requests for additional information or clarification.

#### **Institutional Accrediting History** (Section I.B.) (CFR 1.8)

- Is sufficient information provided about *relevant* issues raised in past substantive change reviews at the institution, even if the reviews were for programs at a different degree level and/or in different departments or colleges?
- Does the proposal provide responses to *relevant* issues raised in past Commission or Committee action letters? (For instance, were concerns raised about assessment or educational effectiveness?)

#### **Program Need** (Section II.A.) (CFRs 1.1, 1.7, 1.8, 2.1, 2.12, 4.1 – 4.3, 4.6, 4.7)

- Is the need for the program clearly documented beyond the institution's desire to offer the program?
- Does the evidence of need for the program include specific data about the institution and the region, in addition to national trends and employment outlook statistics?
- What activities has the institution undertaken to help assess need, e.g. student or graduate surveys, documenting the number of inquiries, business or professional indications of interest, etc.?
- Are the enrollment projections for the first three years provided?

#### **Marketing** (Section II.A.) (CFRs 1.7, 1.8, 2.12)

- Is the geographic scope of the program clearly identified?
- Does the marketing plan contain adequate outreach to the target population?
- Are the marketing costs included in the budget?

**Planning and Approval Process** (Section II.B.) (CFRs 1.8, 4.1, 4.2)

- Is proof of program approval included (minutes or letter of approval from President and/or system-wide office) along with the description of the institution's process?
- If a CSU campus, is the Chancellor's office letter of approval attached to the proposal?

**External Partners** (Section II.B.) (CFRs 1.8, 4.1, 4.2)

- Are signed MOUs attached for any arrangements with an external partners participating in the program (subcontractors, internship placement sites, off-campus facilities, etc.)?
- If the program has yet to develop arrangements with external partners, is there a sample signed MOU or a MOU template?
- Do relationships with external partners comply with WASC's *Policy on Agreements with Unaccredited Entities*?

**Curriculum** (Section III.A.) (CFRs 2.1, 2.2 – 2.5, 2.8, 3.5, 4.1, 4.4, 4.7)

- Does the list of courses for the major indicate which courses are required?
- Is a sample schedule provided that shows how a student might progress through the program from semester to semester?

**Syllabi** (Section III.A.) (CFRs 2.2, 2.3 – 2.5)

- Do the syllabi contain course learning outcomes linked to program learning outcomes, a course schedule including all assignments, expectations about use of the library, and relevant university policies?
- Do all syllabi reflect the credit hours awarded and expectations for student work time (in and out of class) consistent with WASC's and the institution's Credit Hour Policy?
- Are the syllabi adapted to the modality or timeframe of the course?
- Is the syllabus for the capstone or culminating experience provided, in addition to three course syllabi?
- Does the syllabus for the capstone or culminating experience contain the rubrics for its evaluation?
- Are there qualitative as well as quantitative rubrics?

**Credit Hour Policy** (Section III.C.) (Policy on the Credit Hour, CFR 2.1)

- Is the institution's credit hour policy attached?

**Educational Effectiveness** (Section III.B., Doctoral template: Section III.A. and IV.A.)  
(CFRs 1.2, 2.1 – 2.9, 3.2, 3.3, 4.1 – 4.7)

- Does the curriculum map show progression of learning from introductory to advanced levels?
- Are all learning outcomes in the curriculum map achieved at an advanced level by the time the student has completed all courses in the program?
- Does the assessment plan clearly outline the annual plan for assessing the program, as well as the individuals responsible for conducting the assessment and ensuring that information learned from the assessment is used to make improvements to the program?
- Does the assessment plan include direct and indirect measures and does it include both formative and summative assessment?
- Is achievement of all program learning outcomes assessed?
- Is the program included in the institution's program review process?
- Does the institution have a clear process for follow-up with sufficient accountability?
- Is teaching effectiveness evaluated in any means other than a student evaluation?

**Faculty** (Section IV.A., Doctoral template: Section V.A.) (CFRs 2.1, 2.2b, 2.8, 3.1 – 3.5, 3.7)

- Is the number of FT and PT faculty dedicated to the program clearly identified?
- Are plans for faculty hires included as enrollment grows?
- Does the proposal indicate how many students each faculty member will advise?
- Does the proposal explain the faculty workload expectations and the impact the proposed program will have on faculty workload?
- Are faculty CVs limited to no more than 5 pages each?

**Library/Information Resources** (Section IV.C, Doctoral template: Section V.C.)

(CFRs 2.3, 2.13, 3.4, 3.5)

- Are information literacy competencies clearly articulated (for undergrad programs only)?
- Is the assessment of information literacy competency explained?

**Finances** (Section V.A., Doctoral template: Section V.F.) (CFRs 3.4, 3.5, 4.2, 4.3, 4.6, 4.7)

- Does the budget cover the first three years of the program?
- Are assumptions included in the budget?
- Does the budget include student and faculty number and FTE projections? Is a realistic student retention rate identified?
- Does the budget reflect true costs of launching and sustaining the program in areas such as marketing, IT, library, student support services, especially where increases in these areas are anticipated to be needed?
- Is the budget specific to the program being proposed?

**Teach-Out** (Section VI.A.) (CFRs 1.6 – 1.8)

- Is the institution's teach-out or program discontinuation policy attached?

**In addition to the items noted above, the following are issues related to specific types of programs:**

## **Undergraduate Programs**

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**General Education** (Section III.A.) (CFRs 2.1 – 2.2a)

- Is information provided about the General Education program, including a link to the GE web page?

**Curriculum** (Section III.A.) (CFRs 2.1, 2.2a)

- Is the curriculum appropriate to the degree level?

**Syllabi** (Section III.A.) (CFRs 2.1, 2.2)

- Are the assignments of appropriate rigor and expectations for the degree level?
- Are the number of credit hours earned and expectations for how those hours are earned both in an out of class provided?

**Faculty** (Section IV.A., Doctoral template: Section V.A.) (CFRs 2.2b Guideline, 2.4, 2.8, 3.1, 3.2, 3.10)

- Who will actually be assigned to teach in the program? (full or part time?)
- How does the institution ensure faculty ownership of the program, especially in online programs and/or those that rely heavily on adjunct faculty?

## Graduate Programs

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**Curriculum** (Section III.A.) (CFRs 2.1, 2.2, 2.2b)

- Is the curriculum appropriate to the degree level?

**Syllabi** (Section III.A., Doctoral template: Section III.A. and IV.A.) (CFRs 2.2b, 2.8)

- Are guidelines for the dissertation included?
- Are guidelines and rubrics for the qualifying exam included?
- Is it clear how the quality of the thesis/capstone is assessed?

**Faculty** (Section IV.A., Doctoral template: Section V.A.) (CFRs 2.2b Guideline, 2.4, 2.8, 2.9, 3.1, 3.2, 3.10)

- Do faculty teaching in the program have advanced degrees that qualify them to teach at the level being proposed?
- Are faculty qualified to teach and support all aspects of a doctoral program? Do their CVs reflect an appropriate history of research and scholarly activity for the proposed program?
- How will faculty be selected, inducted, mentored, and evaluated for the proposed program? What is the professional development plan to support faculty as instructors, advisors, and scholars?
- Who will actually be assigned to teach in the program? (full or part time?)
- Are faculty workload issues clearly outlined, including release time for advising theses or dissertations?

**Graduate Culture** (Section I.B., III.A., IV.A., Doctoral template: Section I.B., III.A., IV.A., V.A., V.B.) (CFRs 2.1, 2.2b, 2.8)

- How will a graduate culture be developed and sustained?
- For doctoral programs, how does the institution propose to develop or sustain an appropriate doctoral culture (professional or research doctorate?) How is the nature of the research environment and expectations for both faculty and students described and is this appropriate to the doctoral level?
- How will the institution support faculty scholarship?
- Are opportunities for research and professional development available for students as well as faculty?

## Distance Education Programs

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**Curriculum** (Section III.A., III.B., III.C., III.D., IV.D., Doctoral template: III.A., III.B., III.C., V.D.) (CFRs 2.1, 2.2, 2.5, 2.11 – 2.13)

- How are students qualified and prepared for the online program?
- Is the plan for developing the 100% online program clear, including prerequisites and electives?
- How will a graduate culture be developed and sustained in an online environment?
- Are technology requirements for students clearly outlined?

- For undergraduate programs, are all of the General Education courses available online?

**Syllabi** (Section III.A., III.C., III.D.) (CFRs 2.1, 2.2, 2.12, 3.5)

- Have syllabi been fully adapted to an online learning environment, including faculty/student interactions, student/student interactions and use of a variety of resources available online?
- What are the expectations of student participation in online discussions and how are they evaluated?
- Do syllabi for online courses reflect "on-line-ified" F2F syllabi, or has there been considerable reworking to truly reflect the online delivery modality, including outcomes specific to online delivery?
- Do the syllabi reflect the institution's credit hour policy regarding the amount of time required to complete the course?

**Faculty** (Section IV.A., Doctoral template: Section V.A.) (CFRs 3.1 – 3.3, 3.5, 3.10)

- Do faculty CVs show previous online teaching experience?
- What training and support is provided for the faculty to teach in the online modality, initially and ongoing?
- Who will actually be assigned to teach in the program? (full or part time?)
- Is there a recognition in determining faculty workloads that online courses require additional time as compared to F2F?
- Has the institution developed guidelines for distance education?

**Assessment** (Section III.B., IV.A., Doctoral template: Section IV.A., V.A.) (CFRs 2.1 – 2.7, 2.10, 4.1 – 4.5)

- Do the assessment plans specifically address the modality, including the course management system?
- Is information included about what has been learned from other distance ed programs in other Schools and programs in earlier reviews?
- How will faculty be assessed in the online environment other than student evaluations?
- How has the use of online technologies been incorporated in the program's learning outcomes?
- Are there plans to compare on-campus and distance ed models of the same program?
- How will the program monitor student attrition?

**Support Services** (Section IV.B., IV.C., Doctoral template: Section V.B., V. C, V.D.) (CFRs 2.11, 2.13, 3.5)

- Are support services for distance education students available at a level comparable to those provided to F2F students (library resources, advising, financial aid, career services, etc)?
- How will the institution respond to students who appear to be struggling with learning in the online environment?
- Are helpdesk services available to remote or working students at hours that are convenient to them? Is there a student handbook specifically geared to the online student?
- Is the technology support at the institution sufficient to support an on-line modality?

**Budget** (Section V.A., Doctoral template: Section V.F.) (CFRs 3.1, 3.3, 3.4)

- Does the budget include the expense of converting F2F courses to the online modality?
- Is the expense of technology support for the program included in the budget (direct or indirect)?

**Credit Hour Policy** (Section III. C.) (Policy on the Credit Hour, CFR 2.1)

- Does the institution's credit hour policy adequately outline the amount of time students are expected to work on-line and off-line for the number of credit hours awarded?
- Is the institution's credit hour policy included in the proposal?



