



Substantive Change Manual

A GUIDE TO SUBSTANTIVE CHANGE
Policies and Procedures



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Preface

The WASC Senior College and University Commission 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 more 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, WASC 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 WASC requirements.

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

Availability of General Modality Approval for Distance Education

Effective July 1, 2013, the Commission may award General modality approval to institutions that have five or more 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 which the institution has General or Specified degree-level approval. Please contact your staff liaison or substantive change staff member 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 in which 50 percent or more of the program will be offered through distance education.

Changes to Categories of Off-Campus Locations

Branch Campus (formerly Regional Center)

To better align with U.S. Department of Education nomenclature, WASC has changed the designation Regional Center to Branch Campus. In order to be recognized as a Branch Campus, the location must:

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

If your institution operates a previously designated Regional Center that does not meet all of these requirements, please contact the substantive change staff to discuss the implications for the location.

Institutions planning to implement a new branch campus, or designate an off-campus location as a branch campus, must seek substantive change approval prior to implementing the change.

Stand-alone Location (formerly Off-campus Location)

The name of an off-campus location that is 25 miles or more from the main campus or a designated branch campus has been changed to Stand-alone Location. The review process for new stand-alone locations has been revised to expedite approval when possible.

Changes to Review Process for Stand-alone Locations and Branch Campuses

Effective July 1, 2013, 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 WASC staff, eliminating the need for committee review, unless one or more of the degree programs being offered at the location also requires approval. If during the review, the staff determines 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. This policy does pertain to international locations, which still require Substantive Change Committee review.

Review of Competency-based or Direct Assessment Degree Programs

Institutions planning to implement a degree program in which the entire degree is awarded on the basis of the assessment of student competencies, not on the credit hour, are required to seek prior approval from WASC. The first competency-based or direct assessment program at an institution will be reviewed as a structural change.

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 WASC review substantive changes?

WASC 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 fee at least nine 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 typically take approximately two months longer to complete. Institutions are encouraged to plan accordingly because programs cannot be started without WASC approval.

Who reviews my proposal for a substantive change?

Proposals are reviewed by the WASC 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 WASC website (www.wasc-senior.org) lists members of the Substantive Change Committee and the Structural Change Committee.

How can 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 WASC 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 and an off-site and 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 WASC'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. WASC's substantive change policy is shown in Appendix 2. In addition, the Commission has approved other policies that relate to substantive changes. These are also 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.
- The complexities of changes in control and ownership of an institution.
- Increases in collaborative offerings among institutions.
- WASC accountability in responding to public inquiries about the comparability of quality and the accreditation status of these kinds of programs.

Understanding Degree-Level 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 WASC'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 WASC staff liaison or the substantive change staff if you have questions about the level of degree-granting approval currently assigned to your institution.

Distance Education Programs

Effective July 1, 2013, 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 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 50 percent or more of which will be offered through distance education.

Resources

Degree Level Approval Policy

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 WASC staff liaison if you need further information.



Levels of Review for Substantive Change

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

Staff Review. WASC staff members can 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 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), correspondence education, or competency-based program
- First branch campus location reviewed by WASC
- 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 is conducted by the Substantive Change Committee and 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
- 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
- Change in ownership or control, including mergers and acquisitions

Institutions are reminded to consult with their WASC 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 WASC Commission and the Substantive Change Process

WASC Senior College and University Commission

WASC 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

One of the WASC 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.

WASC Commissioners

Commissioners are nominated and elected by the chief executive officers of accredited institutions in the WASC 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

The information described in this section is summarized below. The 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
NEW PROGRAM	New degree program ¹ (On-site)	Committee review ²	No
	New distance education ³ , correspondence education, or direct assessment program ⁴ (50% or more of degree program)	Committee review ²	No
	Dual degree program ⁵	Committee review ²	No
	Joint degree program ⁵	Committee review ²	No
NEW SITE	New site (50% or more of a degree program, less than 25 miles from main campus or WASC-recognized branch campus)	No review required	No
	New site (50% or more of a degree program AND 25 miles or more from main campus or WASC-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	For off-campus programs, sampling of sites will be visited during comprehensive review
	Duration: change in length of degree program (25% or more increase or decrease)	Committee review	No
DEGREE LEVEL	First degree program at a new degree level (including joint degree)	Structural change review	Pre-implementation visit may be required
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 would be reviewed by the Committee and the Commission (structural change).

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

4 The first direct assessment program at an institution will be reviewed by the Committee and the Commission (structural change).

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 WASC staff person. This process requires the submission of an expedited proposal. The institution will receive notification within 45 days after the review.

OFF-CAMPUS SITES: Stand-Alone Location or Branch Campus

WASC recognizes two types of off-campus sites: stand-alone locations and branch campuses, which must receive prior approval by WASC 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 and
- 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 WASC maintain addresses of all locations geographically separate from the main campus at which 50% or more of at least one degree program is offered, regardless of their distance from the main campus. It is the responsibility of every accredited institution to report to WASC accurate and current addresses.

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 WASC-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 off-campus programs. The development of a branch campus may be most effective for institutions that plan to offer multiple off-campus programs within 25 miles of the proposed branch campus. Development of a branch campus allows an institution to open additional off-campus locations within 25 miles of the branch campus without seeking prior WASC approval for each program or location. A specific review for approval of a branch campus is required to achieve the exemption for additional locations.

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



Review Process

Expedited review proposals are reviewed by staff members within 45 days of receipt. No further Commission approval is required. See the Schedule of Dues and Fees for the cost of an expedited review.

Domestic Locations

Effective July 1, 2013, 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 existing 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 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 WASC-designated branch campus do not require prior approval but must be reported to WASC within 30 days of establishment using the Program Implementation form found in the Document Library on the WASC website.

Partnerships with Other Institutions

An off-campus program involving a partnership with another institution follows the off-campus program guidelines, assuming that both institutions have the required level of degree-granting approval to offer the program.

With its proposal, the institution must submit a Memorandum of Understanding (MOU) or comparable document that clearly articulates each institution's responsibility for academic and support services. The arrangements must adhere to the policy on Contracts with Unaccredited Organizations.

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

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

Changes of location for off-campus sites within 25 miles of the main campus or WASC-approved branch campus do not have to be approved as substantive changes, but must be reported to WASC on the Change of Address Form found in the Document Library on the WASC 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 WASC prior to, or at the time, of the change.

Closing a Site

WASC policy requires staff or Committee approval if an institution intends to cease operations entirely or close a site that offers 100 percent of at least one degree program. For more information, see the Teach-Out Plans and Agreements Policy, available in the Document Library on the WASC website.

Teach-Out Agreement with Another Site

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 receive substantive change approval 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 WASC 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, off-campus locations (stand-alone and branch campus), 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.

Expedited review proposals are evaluated by staff members within 45 days of receipt. No further Commission approval is required. See the Schedule of Dues and Fees for the cost of an expedited review.



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 WASC approval. Contact your WASC 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, masters, or 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 WASC staff liaison if they believe a change of 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 WASC in their annual report to WASC 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 need substantive change review, please consult your staff liaison or the substantive change staff.

Changing the Curriculum or Requirements of a Program

WASC 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 designation to offer doctoral programs must seek approval for those programs and demonstrate an understanding of the distinctive character of doctoral education. This includes demonstrating that an institution can support a doctoral culture, while maintaining institutional capacity and 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 baccalaureate and master's programs 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 will 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.

Resources

Best Practice Strategies to Promote Integrity in Online Education

Guidelines for the Evaluation of Distance Education

Distance Education or Correspondence Education

Effective July 1, 2013, 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 prior approval for new distance education programs 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. All correspondence education programs (50 percent or more of the degree program, regardless of the institution's degree level approval) must receive substantive change approval prior to implementation. 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.

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

Correspondence Education refers to courses for which an institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor. The courses are typically self-paced and interaction between the instructor and the student is limited, not regular and substantive, and primarily initiated by the student.

Verification of Student Identity

In keeping with federal policy, WASC requires institutions that offer distance or correspondence 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 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 sole 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. For the purposes of this requirement, an institution is expected to seek prior WASC approval when the entire degree is awarded on the basis of the assessment of student competencies. The first competency-based program at an institution will be reviewed as a structural change.

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 WASC approval if students will be eligible for Title IV funds for the program.

As applied to the WASC 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 WASC 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.

In view of the distinctive character of these features, WASC anticipates that a direct assessment program will be designed holistically and delivered under its own specific parameters. As such, institutions are not expected to submit proposals for a blended model or for plans to incrementally morph an existing course- or seat-time based program into a direct assessment program. A specific template is provided for direct assessment program proposals.



OFF-CAMPUS SITES: Branch Campus or International Location

A **branch campus** is an expanded off-campus location that may serve as an administrative and support center for additional locations, 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 multiple off-campus programs, which may be opened without seeking prior approval from the Substantive Change Committee if they are within 25 miles of the branch campus. 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

Effective July 1, 2013, 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 WASC 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 existing 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.

Plans for **international locations** require review by the Substantive Change Committee.

Teach-Out

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 receive WASC approval 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 WASC 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. 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 WASC.

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 WASC, 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 WASC-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 WASC 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.

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.

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 Committee needs 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 WASC 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 WASC's Policy on Joint Degrees Offered Collaboratively by Two or More Institutions and Standard 2 in the Handbook of Accreditation. While the Standards of Accreditation and the Criteria for Review (CFR) as a whole provide a framework for institutional self-evaluation, Criteria for Review 2.1-2.4 offer guidance on content, structure, nomenclature, and expectations for student achievement for baccalaureate and graduate degree programs.

If one of the partnering institutions is on sanction with WASC, 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 WASC's Policy on Dual Degree Programs Offered Collaboratively by Two or More Institutions, available in the Document Library on the WASC 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.

Contracts With Unaccredited Organizations

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 may review WASC's Policy on Contracts with Unaccredited Organizations.

Fast Track Authorization

Fast Track Authorization (previously known as Systems Review) allows institutions to implement programs of a particular modality or degree level over a five-year period without seeking prior approval from the Substantive Change Committee. 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 submit abbreviated proposals that are reviewed by the WASC staff within 45 days. The Fast Track Authorization Criteria outline institutional eligibility for this type of approval.

Categories of Fast Track Authorization

Institutions may request Fast Track Authorization for:

- Bachelor's or master's degree programs
- Distance education program
- Conversion of an existing face-to-face program to a distance education program

A separate authorization is required for each type of approval. A Fast Track Authorization request is submitted simultaneously with a proposal for a program within the scope of the Fast Track Authorization request.

Criteria for Fast Track Authorization

The Fast Track Authorization process is available to institutions that:

- Have been successful in implementing the programs at the degree level and/or modality for which they are seeking authorization
- Do not have any resource or capacity issues that affect their eligibility for this authorization
- Have consulted and received approval from the WASC staff liaison before applying for authorization

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.

A WASC staff recommendation for Fast Track Authorization is based on, but not limited by, whether an institution has:

- Demonstrated substantial experience in implementing at the degree level or modality for which approval is sought. This is normatively measured by three or more approvals by the Substantive Change Committee in the modality or degree level for which they are seeking authorization, that have been in operation for a minimum of one year
- 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
- Been accredited for at least 10 years

Fast Track Authorization for Change of Modality

Institutions may apply for Fast Track Authorization to convert **existing** face-to-face programs to distance education programs. Institutions are eligible for the expedited 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 WASC staff liaison

This is similar to WASC's current 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 WASC staff within 45 days. There is no expiration date for this type of authorization.

This authorization does not apply to international programs, new degree programs that do not already exist on-campus or at another approved off-campus location, or 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.

Review Process

Once Fast Track Authorization has been granted, the institution submits (through LiveText) its proposals for programs within the scope of the authorization to WASC for staff review before program implementation.

The proposal asks for information about:

- Program title, location, start date, modality of instruction, and anticipated size

- Learning outcomes
- Plan for faculty members and other support
- Physical resources
- Budget (three to five years)
- Plan for assessment
- MOUs with third party providers participating in the program

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 WASC 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 WASC office before a proposal will be reviewed. Please refer to the Document Library on the WASC website for the Schedule of Dues and Fees.

Renewal of Fast Track Authorization

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

Note that the programs implemented during the authorization period do not need to be reviewed after the authorization period expires. The intent of the Fast Track Authorization renewal process is for the institution to maintain its ability to implement future programs without prior approval from the Committee.





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)
- A review by the Structural Change Committee of the Commission
- Approval by the Commission

Some structural changes also require a follow-up site visit six months after implementation. Note that structural change reviews generally take at least two

months longer to complete than reviews conducted only by the Substantive Change Committee.

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. Joint degree programs are subject to structural change review if the degree level offered is new for one of the institutions.

First Competency-Based or Direct Assessment Program

The first degree program at an institution in which the degree is awarded entirely on the basis

of the assessment of student competencies is considered a structural change.

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.

When an unaccredited institution merges with a WASC-accredited institution, accreditation is not automatic. Institutions are strongly encouraged

to review WASC's policy on Appropriate Level of Review of Proposed Changes in Mission, Legal Status, Ownership, or Control and consult with their WASC staff liaison to discuss the process and timeline of 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. Then the WASC 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 the WASC's policy on Institutions with Related Entities, institutions planning a change in ownership involving a **related entity**¹

¹ 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.

must respond to the elements listed in the Change in Ownership 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 WASC 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 will require 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 WASC's expectation for an independent and qualified governing board. They 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.
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.

WASC 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 WASC 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 WASC.





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 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 is notified and the institution is 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 program was launched prior to receiving the requisite substantive change approval(s).
- Audit of the institution’s off-campus and distance education programs. Additional programs 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 receive necessary approvals prior to implementation.

After the Substantive Change Committee reviews this information, the matter is 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).



Substantive Change Review Procedures

This section provides detailed information on the substantive change proposal development and review process. Institutions may also refer to the process flow diagram on the next page that illustrates the steps involved, from the initial submission of an application to the final action on a proposal.

STEP 1: Determine Whether a Change Is Considered Substantive

Please refer to Section I: Substantive Change Policies, which 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 an institution will navigate the substantive change process. Institutions are also encouraged to contact their WASC staff liaison and/or the Substantive Change staff for guidance.

STEP 2: Submit Application and Fee

Once a proposed change is determined to require approval, the Accreditation Liaison Officer (ALO) submits a Substantive Change Application form and related fee (found in the Dues and Fees Schedule in the Document Library on the WASC website). The application, signed by the institution's ALO to ensure that the proposed change is supported by the institution, must be filed with WASC at least nine months prior to the anticipated implementation date.

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 to nine 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

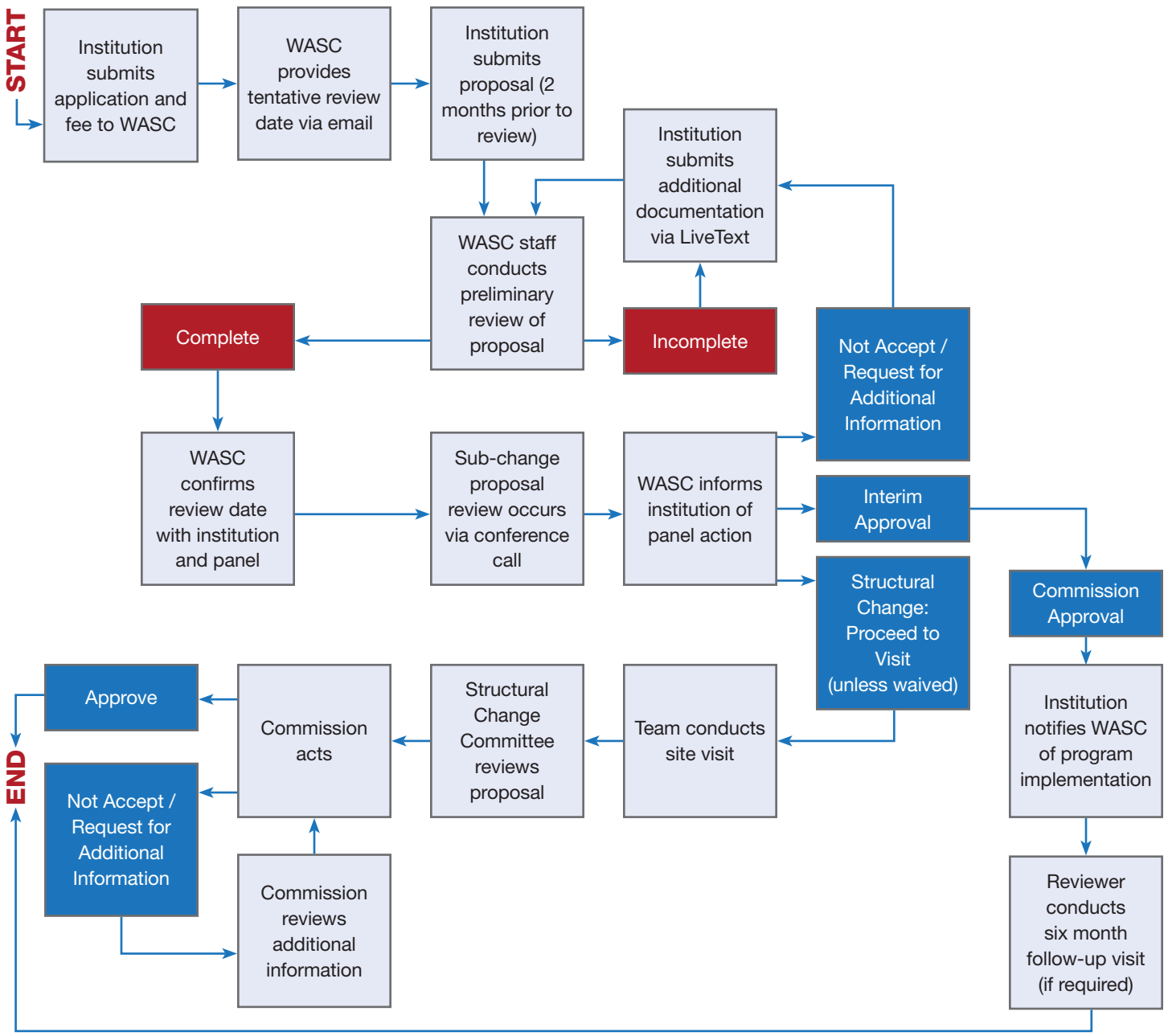
It is important to consider the full time frame for the review process. Note that the proposed change must receive full approval from the Commission before an institution may implement the change. This approval usually occurs within one month of an Interim Approval recommendation from the Substantive 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 Commission meets monthly in person or by conference call to take action on substantive changes.

Resources

Substantive Change Application Form

Schedule of Dues and Fees

Substantive Change Process Flow Diagram



STEP 3: Develop the Proposal

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

- The specific template to complete for the type of change being proposed
- A user's guide to LiveText, the online submission tool
- A preliminary review checklist
- The proposal due date (typically two months prior to the Substantive Change Committee review date)
- The tentative date of the Substantive Change Committee review

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 WASC.

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 in the user guide and respond to each element within the template. Proposals may be no longer than 10,000 words, not including attachments. Appendices may be attached to the appropriate section of the template.

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

- Clearly written and responsive to each element
- 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, i.e., have complete and detailed budgets

See the document [Top 10 Reasons Substantive Change Proposals Are Not Approved](#) for more information on how to avoid common errors.

Internal Review

Before submitting the proposal to WASC, the ALO is expected to conduct a thorough review of the entire proposal using the Preliminary Review Checklist provided by WASC 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 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.



Resources

[Guide to Submitting Substantive Change Proposals](#)

[Preliminary Review Checklist](#)

[Top 10 Reasons Proposals are Not Approved](#)

[Substantive Change Proposal Samples](#)

[Substantive Change Proposal Templates](#)



STEP 4: Submit the Proposal

The proposal must be submitted via LiveText **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 reschedule a confirmed review less than three weeks prior to the review date. (Refer to the Schedule of Dues and Fees for the amount of the fee.)

Preliminary Review by the WASC Staff

Once the proposal is submitted, WASC 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 WASC 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.

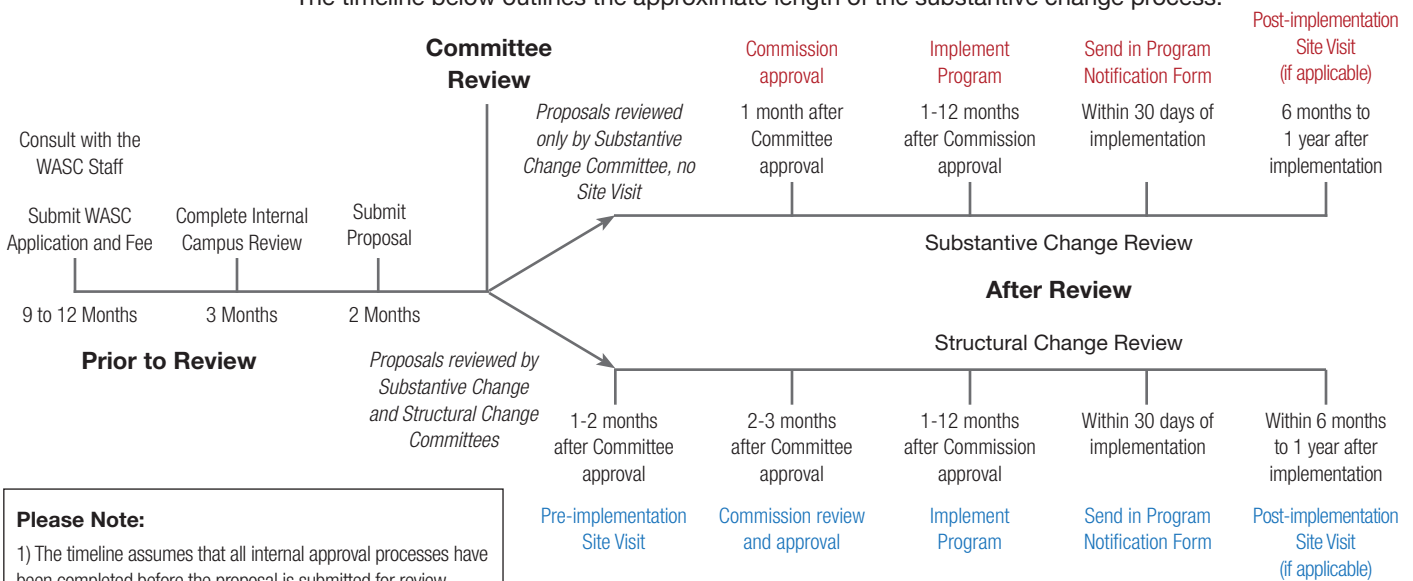
Note that the WASC staff, along with the Substantive Change Committee, reserves the right to remove any proposal from its docket if the submission is excessively incomplete. The preliminary review is designed to assist the institution in avoiding a Not Accept action by the Committee.

Table 2: Timeline for Marketing and Implementing New Programs

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

Timeline for Substantive Change Review

The timeline below outlines the approximate length of the substantive change process.



Please Note:

- 1) The timeline assumes that all internal approval processes have been completed before the proposal is submitted for review.
- 2) The timeline does not depict the Not Accept action, as intervals will vary depending on how long it takes an institution to respond to the request for additional documentation or changes.

STEP 5: Participate in the Review via Conference Call

The WASC 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 WASC office.

All substantive change proposals are reviewed by a two- or three-person panel drawn from the Substantive Change Committee. Panel members 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 staffing

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 40-minute discussion by conference call with the panel and a WASC 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 WASC

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

1. Interim Approval
2. Proceed to Site Visit (if applicable)
3. Refer to Commission
4. Not Accept

Interim Approval

Within 10 business days, the WASC 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 issues raised in the action report, typically by the time of the next site visit.

Once a proposal receives Interim Approval from the Substantive Change Committee, it will be forwarded to the Commission for Final Approval. In all cases, Final Approval must be granted by the Commission before any proposed change may be implemented. 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 or denied.

Proceed to Site Visit (for Structural Changes)

If the proposed change requires a pre-implementation site visit, the WASC 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 WASC staff, the ALO, and the visit team.

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, within 10 days the institution will receive an action letter from the WASC staff on behalf of the panel outlining next steps.

The Substantive Change Committee also reserves the right to recommend that a proposal 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

The Substantive Change Committee may determine that a proposed change is not ready for review by the Commission, in which case the Committee will take a Not Accept action. The institution will receive from WASC, 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, and provides information on the steps to resubmit the proposal if the institution chooses to do so.

The review panel may be request:

- An additional report or more evidentiary materials
- Another Committee review
- An additional conversation with the institutional representatives

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.

The institution is responsible for addressing any requests for additional information or conducting any other follow-up requested.

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 WASC 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. 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 report to WASC, which will forward it to the institution for correction of errors of fact. The panel will reconvene to determine whether the proposal will be granted Interim Approval and forwarded to the Structural Change Committee for its consideration.



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 the 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 WASC 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 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 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 panel.

The proposal, if approved by the Structural Change Committee, will be forwarded to the Commission for Final Approval. The Commission usually approves recommendations of the Structural Change Committee within two weeks and informs the institution by action letter. The letter and the visit report will be posted on the WASC 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.

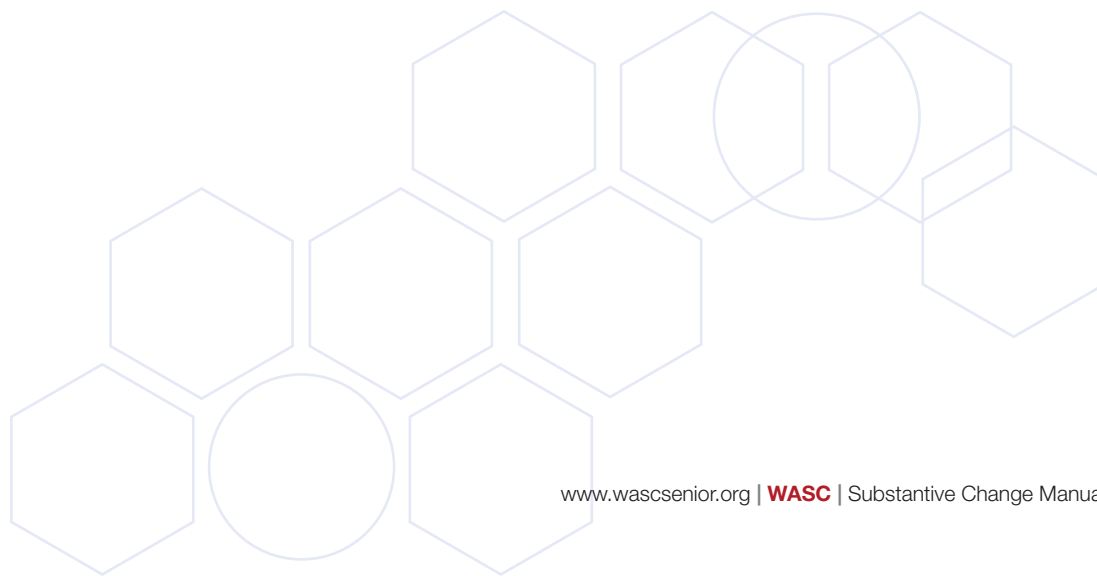




Table 3: Substantive Change Committee Actions and Next Steps

COMMITTEE ACTION	INSTITUTION ACTION	WASC STAFF ACTION
<p>Interim Approval</p> <p>In order to comply with federal regulations, all substantive change proposals must be approved by the Commission. The Substantive Change Committee grants interim approval; final approval is granted by the Commission at its monthly action meeting</p>	<p>Prior to Commission Approval:</p> <p>An institution may enroll students, who may be eligible for financial aid, while the Committee’s decision awaits final approval by the Commission. An institution may not begin classes until Commission approval is received.</p> <p>After Commission Approval:</p> <p>The institution must notify WASC that the proposed program has been started via submission of Implementation Form within 30 days of implementation</p> <p>If post-implementation site visit is required, the institution works with Substantive Change staff to schedule visit within specified time frame.</p>	<p>Prior to Commission Approval:</p> <p>Schedule proposal for approval by the Commission at its next action meeting.</p> <p>After Commission Approval:</p> <p>The staff notifies institution of Commission’s action following the meeting.</p> <p>If post-implementation site visit is required, the staff works with institution to schedule visit within specified timeframe.</p>
<p>Not Accept</p>	<p>Submit additional information as requested by the committee in a revised resubmission with required fee.</p>	<p>Receives and reviews the proposal and fee and schedules a resubmission review for the proposal.</p>
<p>Proceed to Site Visit (Then refer to Commission)</p>	<p>Prior to the Visit:</p> <p>ALO works with Substantive Change staff to plan and schedule the visit.</p> <p>After the Visit:</p> <p>After the visit, institution reviews the report of the visiting team for correction of errors of fact. After responding, institution awaits notification of decision of Commission review.</p> <p>ALO notifies WASC of start of change via submission of Implementation Form within 30 days of the date of implementation.</p>	<p>Prior to the Visit:</p> <p>Substantive Change staff works with ALO to plan and schedule visit.</p> <p>After the Visit:</p> <p>Proposal is scheduled for review by a panel of the Structural Change Committee of the Commission. Notification of the panel’s decision is communicated to the institution by Action Letter following approval.</p> <p>If post-implementation site visit is required, work with institution to complete within specified time frame.</p>
<p>Refer to Commission (No Site Visit Required)</p> <p>Action taken if a proposal requires Commission review, but a site visit is not required.</p>	<p>Prior to Commission Approval:</p> <p>Institution awaits notification of decision of Commission review.</p> <p>After Commission Approval:</p> <p>ALO submits implementation form within 30 days of implementation</p>	<p>Prior to Commission Approval:</p> <p>Proposal is scheduled for review by a panel Structural Change Committee of the Commission. Notification of the panel’s decision is communicated to the institution by Action Letter following approval.</p> <p>After Commission Approval:</p> <p>If post-site visit is required, work with institution and Substantive Change committee to complete within six months of implementation.</p>

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 Live-Text and may be no more than 5,000 words in length, not including attachments.

Revised proposals are reviewed by the WASC 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 WASC of Implementation

Under Standard One, the institution is responsible for notifying WASC within 30 days of the implementation of a substantive change using the appropriate Implementation Form found in the Document Library on the WASC website. Failure to notify WASC 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.

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 more than two years after approval, contact your WASC staff liaison to discuss whether the change will need to be re-approved.

Site visits are required for certain types of substantive changes, based on U.S. Department of Education and WASC 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.

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 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.

Please refer to the Structural Change Site Visit Guidelines found in the Document Library on the WASC website.

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

Expenses

Evaluator expenses and the applicable site visit fee will be charged to the institution. Please refer to the Document Library on the WASC website for the current Schedule of Dues and Fees.

Post-implementation Site Visits

Substantive changes may entail post-implementation visits if Committee or Commission staff members request them due to extenuating circumstances or if proposals involve:

- **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.

These visits may be waived for certain types of international programs at the discretion of the Substantive Change Committee.

- **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 to inform WASC that a change of ownership has been completed or that a program at an approved site or off-campus location has been started. The WASC 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.

When possible, one or two members of the Substantive Change Committee panel that oversaw the review will constitute the team that conducts the site visit, which typically lasts one day.

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

Please refer to the Follow-Up Site Visit Guidelines and Checklist and the Off-Campus Site Summary in the Document Library on the WASC 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 WASC website for the current Schedule of Dues and Fees.



Resources

[Structural Change Site Visit Guidelines](#)

[Follow-up Site Visit Guidelines](#)

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.

WASC'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 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) correspondence education, 3) branch campuses, and 4) 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: WASC Substantive Change Policies



The following policies relate to the substantive change process and may be found in the Document Library on the WASC website, www.wascsenior.org.

- Appropriate Level of Review of Proposed Changes in Mission, Legal Status, Ownership, or Control
- Contracts with Unaccredited Organizations
- Degree Level Approval
- Dual Degrees Offered Collaboratively by Two or More Institutions
- Handbook of Accreditation (2013)
- Instruction in Languages Other than English
- Inter-Regional Accreditation
- Joint Degrees Offered Collaboratively by Two or More Institutions
- Institutions with Related Entities
- Teach-out Plans and Agreements
- Schedule of Dues and Fees
- Substantive Change
- WASC 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 WASC website, www.wascsenior.org.

Proposal Development and Submission Resources

- Best Practice Strategies to Promote Academic Integrity in Online Education
- Guide to Submitting a Substantive Change Proposal
- Guidelines for the Evaluation of Distance Education
- Preliminary Review Checklist
- Substantive Change Application
- Substantive Change Proposal Templates
- Substantive Change Sample Proposals
- Top 10 Reasons Substantive Change Proposals Are Not Approved

Site Visit Resources

- Structural Change Site Visit Guidelines
- Follow-up Site Visit Guidelines and Checklist
- Protocol for the Review of Distance and Correspondence Education Programs
- Protocol for the Review of Locations Geographically Apart from the Main Campus

Forms

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

