What is a Substantive Change?

A Substantive Change is a significant modification or expansion of the nature and scope of an accredited institution (i.e. accredited by the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC). Member institutions are required to notify SACSCOC of changes in accordance with the SACSCOC publication “Substantive Change for SACSCOC Accredited Institutions” at http://www.sacscoc.org/pdf/081705/SubstantiveChange.pdf and, when required, to seek approval prior to the initiation of changes.

According to SACSCOC, substantive changes can have a wide variety, including (a) addition of courses or programs that represent a significant departure, either in content or method of delivery, from those that were offered when the institution was last evaluated; (b) the addition of an off-campus instructional location where 50% or more of an educational program is offered; (c) the addition of courses or programs of study at a degree or credential level different from that which is included in the institution’s current accreditation or reaffirmation; and (d) the closing of a program, off-campus site, branch campus, or institution. There are many other types of Substantive Change and this policy and procedures document will address most of these.

SACSCOC Responsibilities Regarding Substantive Change

SACSCOC accredits an entire institution and its programs and services, wherever they are located and however they are delivered. It reviews all substantive changes implemented in the time between an institution’s decennial reviews to determine whether the changes have affected the quality of the total institution and to assure the public that all aspects of the institution continue to meet defined standards.

SACSCOC is recognized by the U.S. Department of Education (USDOE) as an agency whose accreditation enables its member institutions to seek eligibility to participate in Title IV programs. To maintain its recognition with USDOE, SACSCOC has incorporated federal requirements into its substantive change policy and procedures. Some of those requirements specify that an institution seek and receive approval prior to the initiation of a substantive change so that the change can be included in the institution’s scope of accreditation.

Methodist University’ Responsibilities Regarding Substantive Change

It is the responsibility of an institution to follow SACSCOC substantive change procedures and report substantive changes as specified in those procedures. (For reference, see the SACSCOC publication “Substantive Change for SACSCOC Accredited Institutions” at http://www.sacscoc.org/pdf/081705/SubstantiveChange.pdf.) If an institution is unclear as to whether a change is substantive in nature, it should contact SACSCOC staff for consultation. It is expected that each institution will follow the reporting requirements of the Substantive Change policy. Failure of an institution to gain approval for substantive changes involving programs that qualify for federal financial assistance could result in the institution jeopardizing such funding.
Overview of Procedures for Reporting Substantive Changes

According to SACSCOC, there are three procedures for addressing most types of Substantive Changes:

- **Procedure One** for the Review of Substantive Changes Requiring Approval Prior to Implementation (Notification may also be required).
- **Procedure Two** for the Review of Substantive Changes Requiring Only Notification Prior to Implementation (some changes also require submission of additional documents).
- **Procedure Three** for Closing a Program, Site, Branch Campus, or Institution.

For some specific substantive changes, there are other polices/procedures to follow. These are identified in their own section below.

Reporting the Various Types of Substantive Change

Before reporting/submitting any substantive change to SACSCOC, Methodist University (MU) faculty/administrative staff must meet with the Vice President for Planning and Evaluation (VPPE) who serves as the SACSCOC Accreditation Liaison for MU. The VPPE will discuss with faculty/administrative staff proposing the substantive change which procedures must be followed and which documents must be prepared. Before substantive change documents are prepared, certain types of substantive change (indicated below) must be approved through MU’s internal approval process appropriate for that change, particularly those involving major changes to the curriculum. The internal approval process will be covered later in this document.

The following sections describe all types of substantive change identified by SACSOCOC in their publication “Substantive Change for SACSCOC Accredited Institutions” (see the table in that document, pp. 6-10). Many types of change have not been, or are unlikely to be, undertaken at MU, however, the types of change that have been, or are likely to be, undertaken at MU are highlighted in **bold**. This does not assume that the other types of substantive change may not occur in the future. These other types are included in this Policy and Procedures document in case such changes are undertaken.

**Procedure One Substantive Changes**

The following are types of Substantive Change that must follow Procedure One. In most cases, Procedure One changes require (1) **approval from SACSCOC prior to implementation**; and (2) the submission of a Cover Sheet and Prospectus document (described later), except in the case of a Level Change (see the first item below). Again, those substantive changes that MU has undertaken, or is likely to undertake, are highlighted in **bold**.

- **Initiating coursework or programs at a different level than currently approved.** Instead of a Prospectus, an Application for Level Change (which can be downloaded from the “Substantive Change for SACSCOC Accredited Institutions” document at [http://www.sacscoc.org/pdf/081705/SubstantiveChange.pdf](http://www.sacscoc.org/pdf/081705/SubstantiveChange.pdf)) must be submitted. Due dates are March 15 and September 1.
Each of the following Procedure One substantive changes is due January 1 (for implementation between July 1 and December 31) or July 1 (for implementation between January 1 and June 30).

- **Initiating off-campus sites where students can obtain 50% or more credits toward a program** (including but not limited to Early College High School, dual enrollment programs offered at a high school, and certificate programs that are not at an employer’s request and not on short notice)

- **Expanding at current degree level (significant departure from current programs)**

- **Expanding program offerings at previously approved off-campus sites by adding programs that ARE significantly different from current programs at the site AND at the institution**

- **Initiating degree completion programs**

- Initiating a branch campus

- **Initiating distance learning by offering 50% or more of the first program for the first time**

- Relocating a main or branch campus

- Entering into a contract with an entity not certified to participate in USDOE Title IV programs if the entity provides 25% or more of an educational program offered by the SACSCOC accredited institution

- Changing from clock hours to credit hours

Each of the following Procedure One substantive changes requires submission of a Modified Prospectus. Due dates will be determined by SACSCOC staff.

- Initiating a certificate program at a new off-campus site at an employer’s request and on short notice (previously approved program)

- Initiating a certificate program that is a significant departure from previously approved programs at an employer’s request and on short notice

- Adding a site under a U.S. military contract for a previously approved program

- Altering significantly the length of a program

- Altering significantly the educational mission of the institution
**Procedure Two Substantive Changes**

The following are types of substantive change that must follow Procedure Two. All Procedure Two substantive changes require notification of SACSCOC prior to implementation, usually via a detailed Letter of Notification. However, Procedure Two substantive changes do not require approval by SACSCOC prior to implementation. Again, those substantive changes that MU has undertaken, or is likely to undertake, are highlighted in **bold**.

- Moving an off-campus instructional site (serving the same geographic area). (The Letter of Notification must include the old address of the site, its new address, and the date of implementation.)

- **Initiating programs or courses offered through contractual agreement or consortium.** (A Letter of Notification and a copy of the signed agreement is required.)

- Entering into a contract with an entity not certified to participate in USDOE Title IV programs if the entity provides less than 25% of an educational program offered by the SACSCOC accredited institution. (A Letter of Notification and a copy of the signed agreement is required.)

- **Initiating off-campus sites where students can obtain 25-49% of credits toward a program** (including but not limited to Early College High School, dual enrollment programs offered at a high school, and certificate programs that are not at employer’s request and not on short notice). (The Letter of Notification must include the street address of the site and the date of implementation.)

- **Initiating distance learning by offering 25-49% of the first program for the first time.** (The Letter of Notification must include the street address of the site and the date of implementation.)

**Procedure Three Substantive Changes**

The following are the types of substantive change that must follow Procedure Three. Both of these changes require notification of AND approval by SACSCOC prior to implementation. This procedure requires a Letter of Notification with a description of a Teach-Out Plan. (MU has done the first one listed below when it closed approved off-campus sites and brought the instruction in those programs to the main campus.)

- **Closing a program, approved off-campus site, branch campus, or institution where the institution plans to teach out its own students.**

- Closing a program, approved off-campus site, branch campus, or institution where the institution plans contracts with another institution(s) to teach-out students (Teach-out Agreement). In this case, a signed Teach-Out Agreement with the other institution(s) must be included with the Letter of Notification.
Substantive Changes that Follow Other Policies/Procedures

The following types of substantive change have other polices and/or procedures that must be followed. Each of these changes (except one as noted) require approval by SACSCOC prior to implementation. The policies/procedures noted can be found on the SACSCOC Polices and Publications webpage http://www.sacscoc.org/policies.asp.

- Initiating dual or joint degrees involving program expansion (significant departure) or initiating a new site where student can obtain 50% or more credits toward a program. (The policy to be followed is “Agreement Involving Joint and Dual Academic Awards.” A Cover Sheet and Prospectus are required. Due dates are January 1 (for July 1 to December 31 implementation) and July 1 (for January 1 to June 30 implementation). Prior notification of SACSCOC is not required.)

- Initiating dual or joint degrees with other SACSCOC accredited institution(s). (Same policy as in the bullet above. Approval by SACSCOC prior to notification is not required. However, SACSOC must be notified via Letter of Notification at least 6 months prior to implementation. Also a copy of a signed agreement and the contact information for each institution is required. See policy for details.)

- Initiating dual or joint degree with at least one institution not accredited by SACSCOC. (Same policy and document submission as in the bullet above; however, notification of SACSCOC by Letter of Notification must occur at least 6 months prior to implementation.)

- Initiating a direct assessment competency-based program. (The policy to be followed is “Direct Assessment Competency-Based Educational Programs.” A Letter of Notification and a “Screening Form” are required. A Prospectus may be required also. Due dates are March 15 or September 1. See the noted policy for details.)

- Initiating a merger/consolidation with another institution. (The policy to be followed is “Mergers, Consolidations, Change of Ownership, Acquisitions, and Change of Governance, Control, Form, or Legal Status.” Prior notification of SACSCOC by Letter of Notification is required (December 15 or June 1). A Cover Sheet, Institutional Summary Form, and Prospectus are required. Due dates are March 15 or September 1.)

- Changing governance, ownership, control, or legal status of an institution. (Same policy, documents, and due dates as above.)

- Acquiring any program or site from another institution. (Same policy, documents, and due dates as above.)

- Adding a permanent location at a site where the institution is conducting a teach-out for students from another institution that is closing. (Same policy, documents, and due dates as above.)
Substantive Changes that Do Not Require Following Any of the Above Procedures

The following types of substantive changes do not require following any specific Procedure. They also do not require prior notification or approval by SACSCOC. Again, those substantive changes that MU has undertaken, or is likely to undertake, are highlighted in **bold**.

- Initiating a certificate program at an employer’s request and on short notice using existing approved courses and location
- **Initiating certificate program (not at an employer’s request and not on short notice) using existing approved courses and location**
- Initiating off-campus sites (including Early College High School and dual enrollment programs offered at the high school) where students can obtain 24% or less of credits toward a program
- Expanding program offerings at previously approved off-campus sites by adding approved programs that ARE NOT significantly different from current programs at the site
- **Expanding program offerings at previously approved off-campus sites by adding approved programs that ARE significantly different from current programs at the site but NOT at the institution**
- Initiating distance learning by offering 24% or less of any program for the first time

Procedure for Approval of Procedure One Substantive Changes

*Methodist University Internal Review and Approval Process*

As noted above, most Procedure One substantive changes require prior approval by SACSCOC. The process for approval involves SACSCOC review of a Prospectus submitted by the institution, following a specified format. However, before a Prospectus is prepared, the proposed substantive change must go through MU’s internal approval process. This internal process is most likely to involve substantive changes such as those highlighted in **bold** previously in this document. However, no matter what type of substantive change is proposed, the first step in the internal review process is for the faculty or administrative staff member(s) to meet with the Vice President for Planning and Evaluation (VPPE) who serves as the SACSCOC Accreditation Liaison for the University. The VPPE will discuss with faculty/administrative staff proposing the change to determine (1) if the change is a substantive change, and (2) if so, which procedures must be followed and which documents must be prepared.

If a Procedure One substantive change involves a major change to the curriculum, such as the addition of a new academic program which is a significant departure from current programs, then proposers must follow the University’s established Curriculum Change Request procedure:
1. The academic department faculty members develop and approve a program proposal using the University’s Curriculum Change Request Form.
2. The proposal goes to the department’s School faculty for review and approval.
3. If the proposed program is a graduate program, the proposal goes to the Graduate Studies Council for review and approval.
4. The proposal goes to the Curriculum Committee for review and approval.
5. The Curriculum Committee then presents the program proposal to the full faculty for discussion and a vote for approval.

The program proposal can be voted down, modified and resubmitted, etc. at any stage in this process. Only after the full faculty approves the proposed change does the proposal go to the MU Board of Trustees for final internal approval.

Other Procedure One substantive changes include initiating degree completion programs, initiating distance learning by offering more than 50% of the first program for the first time (e.g., a first online degree program), initiating off-campus sites where students can obtain more than 50% of the credits toward a program, and expanding program offerings at previously approved off-campus sites by adding programs that are significantly different from current programs at the site and at the institution. In all these cases, the University’s internal review and approval process should be followed.

Once the substantive change passes MU’s internal review and approval process, the VPPE will meet with the chair of the department (and if needed, the dean of the School) housing the proposed change to guide and assist in preparing the substantive change Prospectus for submission to SACSCOC. (Note, in some expedited circumstances, the MU internal process may proceed in parallel with the preparation of the Prospectus.)

**Preparation of the Substantive Change Prospectus**

A substantive change Prospectus is a document describing in detail the substantive change being proposed for approval by SACSCOC. The Prospectus should be no longer than 25 pages, not counting appendices. The required sections of the Prospectus are:

1. Abstract (one page or less)
2. Determination of Need for the Change/Relationship to Mission/Planning and Approvals for the Change
3. Required Information for the Specific Substantive Change (Select the Change Relevant to the Prospectus and Provide All Information Required for That Particular Change):
   a. New Program
   b. New Off-Campus Site or Branch Campus
   c. Offering of Program(s) via Distance Methodology (Electronic or Correspondence) Delivery for the First Time
   d. Initiation of Degree Completion Programs
4. Faculty Qualifications (including a Faculty Roster Form)
5. Library and Learning Resources
6. Student Support Services
7. Physical Resources  
8. Financial Support  
9. Description of Institutional Evaluation and Assessment Processes for the Change  
10. Appendices

For details on what information to include in each of the sections above, see Appendix B of “Substantive Change for SACSCOC Accredited Institutions” at http://www.sacscoc.org/pdf/081705/SubstantiveChange.pdf.

Reporting a Procedure One Substantive Change

A submission of a Prospectus constitutes reporting a Procedure One substantive change to SACSCOC. The Prospectus submission must include the following in the order listed:

1. Transmittal letter signed by the University’s President which briefly explains the submission  
2. “Cover Sheet for Submission of Substantive Changes Requiring Approval” form (available on the SACSCOC Substantive Change webpage at www.sacscoc.org/SubstantiveChange.asp)  
3. Name, telephone number, and email address of the person who may be contacted concerning questions about the prospectus  
4. A list of degrees and majors which the institution is authorized to grant (photocopy from the academic catalogue is acceptable)  
5. A list of existing approved off-campus sites and their addresses. Note: an approved site is one for which a Prospectus has been submitted and which SACSCOC has approved to offer 50% or more of a program. A site where 25-49% of a program is offered is not considered to be an “approved” site; it is a site for which only notification has been accepted by SACSCOC.  
6. The Prospectus itself

The VPPE will submit one copy of the above materials to the President of SACSCOC at the address listed on the Cover Sheet. The Transmittal Letter and Cover Sheet (items 1 and 2 above) will be submitted in hard copy (paper). Items 3-6 above can be submitted in hard copy (paper), flash drive, CD or DVD. SACSCOC will not accept documents via e-mail.

Upon review of the Prospectus and accompanying materials, SACSCOC will notify the MU President via hard copy letter of its decision regarding the substantive change.

Reporting a Special Type of Procedure One Substantive Change – The Level Change

In its history, MU has submitted, on two occasions, an application for change in degree level: an application to move from Level II (Baccalaureate Level) to Level III (Master Level), and to move from Level III to Level V (Doctoral Level (three or fewer doctoral programs)). MU currently has two doctoral programs, but if/when MU plans to add a fourth doctoral program, then a Level Change Application must be submitted to move to Level VI (four or more doctoral programs). When that occurs, the University must follow the procedures in the document
“Application for Member Institutions Seeking Accreditation at a Higher or Lower Degree Level.” A link to this document can be found on the SACSCOC Substantive Change webpage located at [http://www.sacscoc.org/SubstantiveChange.asp](http://www.sacscoc.org/SubstantiveChange.asp).

Upon review of the Level Change Application and accompanying materials, SACSCOC will notify the MU President via hard copy letter of an upcoming Onsite Level Change Committee visit to the MU campus to further review the University’s proposed level change. At the end of that visit, the committee will meet with MU’s President and key academic and administrative staff to report its findings. A report of the committee’s findings will be sent to SACSCOC, and a final hard copy letter will be sent to MU’s President regarding the decision regarding the level change.

**Reporting Procedure Two Substantive Changes**

As noted, most Procedure Two substantive changes require only notification of SACSCOC prior to implementation. Such notification is usually in the form of a Letter of Notification addressing the specifics of the substantive change. (For details regarding each type of substantive change under this Procedure, see the section Procedure Two Substantive Changes and pages 20-21 of the document “Substantive Change for SACSCOC Accredited Institutions” at [http://www.sacscoc.org/pdf/081705/SubstantiveChange.pdf](http://www.sacscoc.org/pdf/081705/SubstantiveChange.pdf).) The Letter of Notification must also include the date of implementation of the proposed change and, for an off-campus site, the complete physical address of the location. The Letter of Notification constitutes reporting of the substantive change to SACSCOC. Upon review of the Letter of Notification, SACSCOC will notify the MU President via letter of its decision regarding the substantive change.

**Reporting Procedure Three Substantive Changes**

As noted, Procedure Three substantive changes require notification of SACSCOC prior to implementation via a Letter of Notification which must also include a description of a Teach-Out Plan. SACSCOC must then approve the Procedure Three substantive change and associated Teach-Out Plan. The Letter of Notification constitutes reporting of the substantive change to SACSCOC. Upon review of the Letter of Notification and accompanying materials, SACSCOC will notify the MU President via letter of its decision regarding the substantive change.

**Teach-Out Plan**

For Procedure Three changes, a teach-out plan must be submitted within the Letter of Notification to SACSCOC. This plan must be approved by SACSCOC prior to implementation. The teach-out plan must include the following information.

1. Date of closure (date when new students will no longer be admitted)
2. An explanation of how affected parties (students, faculty, staff) will be informed of the impending closure
3. An explanation of how all affected students will be helped to complete their programs of study with minimal disruption
4. An indication as to whether the teach-out plan will incur additional charges/expenses to the students and, if so, how the students will be notified
5. Copies of signed teach-out agreements with other institutions, if any
6. How faculty and staff will be redeployed or helped to find new employment
7. If closing an institution, arrangement for the storing of student records, disposition of final financial resources and other assets

Teach-Out Agreements

If a Teach-Out Plan calls for a contract with another institution to teach-out remaining students (whether closing a program, off-campus site, branch campus, or the University itself), then such a contract (or Teach-Out Agreement) must be approved by SACSCOC prior to implementation. In order to be approved by SACSCOC, the Teach-Out Agreement: (1) must be between MU and an institution that is accredited by a nationally recognized accrediting agency; (2) be consistent with applicable standards in the SACSCOC Principles of Accreditation and with SACSCOC policies; and (3) provide for the equitable treatment of students by ensuring that:

a. the teach-out institution has the necessary experience, resources, and support services to provide an educational program that is of acceptable quality and reasonably similar in content, structure, and scheduling to that provided by MU; and
b. the teach-out institution demonstrates that it can provide students access to the program(s) and services without requiring them to move or travel substantial distances.

See the SACSCOC Good Practices document “Closing a Program, Site, Branch or Institution” for additional discussion of issues regarding closing of programs, sites, branch campuses or institutions. That document can be found via the SACSCOC Policies and Publications webpage located at http://www.sacscoc.org/policies.asp.

Note that SACSCOC reserves the right to authorize a Substantive Change Committee visit to the MU campus regarding any approved substantive change. Such visits will usually occur within 6 months after implementation of the substantive change by the University. Also, SACSCOC may elect to have the Onsite Committee which visits the campus as part of a ten-year reaffirmation of accreditation review any substantive changes that have occurred since the University’s previous ten-year review.

Failure to Comply with Reporting Requirements

If an institution fails to follow SACSCOC substantive change policy and procedures, it may lose its Title IV funding or be required by the U.S. Department of Education to reimburse it for money received by the institution for programs related to the unreported substantive change. In addition, the institution’s case may be referred to SACSCOC Board of Trustees for the imposition of a sanction or for removal from membership.

This Policy approved April 25, 2018 by the Methodist University Administrative Cabinet