



Substantive Change Policy

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Policy Owner: Office of Academic Affairs
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Overview:

Tulane University is required to have policies and procedures to ensure that all substantive changes are reported to its institutional accrediting agency, the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), in a timely fashion. This policy outlines the procedures Tulane University must follow to comply with the SACSCOC Substantive Change Policies and Procedures and Standard 14.2, in adherence to U.S. Department of Education regulations. Adherence to this policy will ensure Tulane University avoids sanctions and penalties, including loss of federal financial assistance and loss of accreditation, associated with non-compliance.

Every SACSCOC member institution has a SACSCOC Liaison whose charge is to ensure compliance with SACSCOC accreditation requirements. The current SACSCOC Liaison for Tulane University is:

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Policy Statement:

Once an academic program has been approved through proper institutional channels (*e.g.*, curriculum committees, faculty committees, the University's Graduate Council, *etc.*), the change should be reported to the SACSCOC Liaison to determine the necessary steps with respect to SACSCOC.

As a member of SACSCOC, Tulane University is required to notify SACSCOC of institutional modifications in accordance with the Substantive Change Policies and Procedures, and when required, seek approval prior to the initiation of such changes.

Substantive change is a significant modification or expansion of the nature and scope of an accredited institution. Substantive changes at Tulane University may include those listed below.

Most commonly encountered substantive changes:

- The addition of courses or programs that represent a significant departure, either in content or method of delivery, from those that were offered when Tulane University was last evaluated.

This includes expanding a program at the current degree level. *Note: What is considered a significant departure will be evaluated by the SACSCOC Liaison. It is defined for convenience below in the “Policy Definitions” section.*

- The addition of courses or programs of study at a degree or credential level different from that which is included in Tulane University’s current accreditation or reaffirmation.
- A substantial change in the number of credit hours awarded for successful completion of a program or significantly altering the length of a program. *What is considered a substantial change will be evaluated by the SACSCOC Liaison.*
- Entering into a contract with an entity not certified to participate in U.S. Department of Education Title IV programs if the entity provides a percentage of a Tulane University educational program. Compliance requirements differ depending on whether the entity provides less than 25% of a Tulane University educational program or 25% or more of a Tulane University educational program. This includes all agreements with entities located outside of the United States. *Note: Federal regulations prohibit agreements with non-title IV entities providing more than 50% of a program.*
- Entering into a collaborative academic arrangement that includes the initiation of a dual or joint academic program with another institution.
- Adding programs with completion pathways that recognize and accommodate a student’s prior or existing knowledge or competency.
- Adding a new off-campus instructional site/additional location (including a branch campus).
- Closing a program, off-campus site, branch campus, or Tulane University.

Other substantive change examples:

- Substantially changing the established mission or objectives of an institution or its programs.
- Changing the legal status, form of control, or ownership of an institution.
- Changing the governance of an institution.
- Acquiring another institution or any program or location of another institution.
- Relocating an institution or an off-campus instructional site of an institution (including a branch campus).

This list of substantive changes is not exhaustive. For a complete list of all instances of substantive change, you are encouraged to review the SACSCOC [Substantive Change Policies and Procedures](#) or contact Tulane’s SACSCOC Liaison with questions.

Initiation of the Substantive Change Procedure:

The reporting and review of substantive change ensure that the scope of programs offered by Tulane University has undergone appropriate review by SACSCOC. If the SACSCOC Liaison determines that a proposed modification rises to the level of a substantive change, the Office of Academic Affairs, through the SACSCOC Liaison, will guide the substantive change process.

There are two SACSCOC procedures for addressing the different types of substantive changes – 1) notifying SACSCOC; and 2) seeking SACSCOC approval. The applicable procedure is dependent on the circumstances of the modification. As outlined in the SACSCOC [Substantive Change Policies and](#)

Procedures, SACSCOC must receive notification or provide approval **prior** to implementation of the Tulane University modification. Note that substantive change approval from SACSCOC may take up to nine (9) months.

Procedure and Timeline for Reporting Substantive Change:

NOTE: Before a proposed academic program can be submitted to SACSCOC for substantive change purposes, it must be approved through the proper institutional channels. Schools and departments are encouraged to contact the SACSCOC Liaison with questions during the development process.

1. Upon receiving notice of a modification that may be substantive, and in all cases of new or expanded programming and degree offerings, Deans or Program Coordinators of the School proposing the modification must notify the SACSCOC Liaison. Notification should be sent at least **twelve (12) months** prior to the modification's anticipated implementation date, and it should include a brief description of the modification. If the modification involves new or expanded programming or degree offerings, involves new courses, faculty hires, or new facilities, a detailed explanation of the new items should be covered in the description, including an overview of the required credit hours for the program, the number of existing versus new courses, faculty, and necessary facilities, respectively.
2. The SACSCOC Liaison will determine whether the modification rises to the level of a substantive change. If it is determined that the modification **does not** rise to the level of a substantive change, the Dean or Program Coordinator will be notified and provided with next steps for implementation. If it is determined that the modification **does** rise to the level of a substantive change, the process will continue with Step 3 below.
3. If a modification has been determined to rise to the level of a substantive change, the SACSCOC Liaison will notify the Dean or Program Coordinator of whether notification to SACSCOC or receipt of SACSCOC approval is required to implement the modification. To make this determination, additional information may be requested from the Dean or Program Coordinator.
4. To notify SACSCOC or seek SACSCOC approval, a substantive change communication must be submitted to SACSCOC. This communication may take the form of a notification letter, a prospectus, or a teach-out plan, depending on the circumstances of the modification. The SACSCOC Liaison will work with the Dean or Program Coordinator to create the appropriate substantive change communication that includes any necessary supporting documentation. It is the School's responsibility to provide all required documentation necessary for the substantive change communication (*i.e.*, a completed prospectus or teach-out plan).

In cases of new or expanded programming or degree offerings, the Dean or Program Coordinator must first seek approval by the appropriate University governance bodies (*e.g.*, the School's faculty and/or curriculum committee; the University's Graduate Council, when applicable; the Sr. Vice President for Academic Affairs and Provost, and the Tulane University Board of Administrators, when applicable) prior to completing the substantive change communication. These approvals may be required documentation in the substantive change communication.

5. Upon completion of the substantive change communication, the SACSCOC Liaison will obtain the required signatures for the communication and submit the communication to SACSCOC.

6. Schools and programs with their own accreditors (e.g., AACSB, ABET, ACGME, CEPH) should also take into consideration how this policy impacts those accreditation processes.

For modifications requiring notification to SACSCOC, the modification may be implemented at Tulane University upon SACSCOC verification of receipt of the notification. For modifications requiring SACSCOC approval, the modification cannot be implemented before receiving SACSCOC approval. Any new program or degree that is advertised before receiving SACSCOC approval must clearly indicate that SACSCOC approval is pending. New programs or degrees may not admit new students before receiving notification of SACSCOC approval. The SACSCOC Liaison will notify the Dean or Program Coordinator when acceptance or approval is received from SACSCOC. Such approval may take up to nine (9) months.

Please note that for a new, expanded, or modified program to be added to or updated in the Tulane University Catalog, the information must be approved through Tulane's Curriculum Inventory Management (CIM) system and by SACSCOC, when applicable, by the catalog deadline (early in Spring semester) before the program is to be offered. The Catalog is published on an annual basis, in advance of the start of each academic year. New programs or changes to existing programs seeking implementation or start dates other than the Fall semester must be approved by the Sr. Vice President for Academic Affairs and Provost.

If it is discovered that a modification that may be considered a substantive change has been implemented without notification to the SACSCOC Liaison, the Dean or Program Director has the responsibility to notify the SACSCOC Liaison *immediately*. It is then the responsibility of the SACSCOC Liaison to notify SACSCOC as provided in the SACSCOC Substantive Change Policies and Procedures.

Enforcement:

Failure to comply with SACSCOC substantive change procedures could result in Tulane University's loss of Title IV funding and require Tulane University to reimburse the U.S. Department of Education money received for programs related to the unreported substantive change. There are also potential accreditation consequences, which may include extensive University-wide reporting requirements, monitoring by SACSCOC and publication of Tulane University's name on a monitored institution list, and removal from membership with SACSCOC.

Substantive Change Log:

When the SACSCOC Liaison is notified of a potential substantive change, that change will be recorded in the University's Substantive Change Log. This serves to document the rationale for determining whether a program modification rises to the level of a substantive change. All program modifications will be documented, regardless of whether such program modifications rise to the level of a substantive change. The Substantive Change Log is managed by the Director of Academic Compliance and Accreditation.

Policy Review:

This policy is to be reviewed annually by the SACSCOC Liaison and the Compliance Certification Committee, a standing committee of the Office of Academic Affairs.

Related Information:

[SACSCOC Website](#)

[SACSCOC Principles of Accreditation](#)

[SACSCOC Substantive Change Policies and Procedures](#)

[Curriculum Inventory Management \(CIM\) System](#)

Policy Definitions (as defined by SACSCOC):

This glossary provides basic definitions of commonly used substantive change words and phrases. It is designed as a quick reference only. Please contact the SACSCOC Liaison, Jessica Shedd, for additional information.

Approval

An official action by the SACSCOC Board of Trustees enabling an institution to implement a proposed substantive change. All changes requiring approval are defined in the SACSCOC Substantive Change Policies and Procedures. An institution secures approval by submitting a substantive change prospectus or application subject to satisfactory review by the Board of Trustees.

Branch campus

An off-campus instruction site/additional location:

- that is geographically apart from an institution's main campus;
- where instruction is delivered; and
- is independent of the main campus of an institution.

An off-campus instructional site is independent of the main campus if it:

1. is permanent;
2. offers courses in educational programs leading to a degree, diploma, certificate, or other for-credit credential;
3. has its own faculty and administrative or supervisory organization; and
4. has its own budgetary and hiring authority.

Closure

The ending of instruction:

- in an educational program;
- at off-campus instructional site;
- in an educational program at an off-campus instructional site or main campus;
- by a method of delivery; or
- at an entire institution
- such that a student cannot complete their program of study as planned.

(See also teach-out agreement and teach-out plan)

Competency-based education by course /credit-based approach

Demonstrating competencies is embedded in a traditional curriculum with courses completed, credits earned, and a credential awarded. Students typically enroll in an academic term and course credits are awarded at the end of the term by demonstrating mastery of the competencies associated with a course. Students may accelerate learning through demonstration of competencies. Transcripts record courses and grades, though the institution may opt to maintain a separate transcript of competencies.

Cooperative academic arrangement

An agreement between a SACSCOC-accredited institution and another entity (or entities) where the SACSCOC-accredited institution records credits on its transcript as its own without delivering all of the educational process for those credits. Examples include geographic or denominational consortia, statewide distance education agreements, collaborative agreements with international institutions, and contractual instruction. *(See also Standard 10.9 – Cooperative academic arrangements in the Principles of Accreditation)*

Dual academic award

A student receives instruction at two (or more) institutions in prescribed curricula leading to each institution granting academic awards at the same credential level. *(See also joint academic award)*

Geographically apart (or geographically separate)

Non-contiguous locations independent of distance. *See also off-campus instructional site /additional location (and branch campus)*

Joint academic award

A student receives instruction at two (or more) institutions in prescribed curricula leading to the institutions granting a single academic award bearing the names, seals, and officials' signatures of each participating institution. *(See also dual academic award)*

Method of delivery

The principal method by which instruction is delivered to include:

- competency-based education (all forms);
- distance education; and
- face-to-face instruction.

Notification

An official communication from an institution to SACSCOC as defined in Substantive Change Policies and Procedures. A notification is complete only when accepted by SACSCOC upon satisfactory review by staff. *(See also approval)*

Off-campus instructional site / additional location

A location:

- geographically apart from an institution's sole main campus; and
- where instruction is delivered.

An off-campus instructional site may qualify as a branch campus. *(See also branch campus)*

Program

A coherent course of study leading to a for-credit credential including a degree, diploma, certificate, or other generally recognized credential. Exception: General education, for substantive change purposes, is usually considered a program even if a credential is not awarded. *(See also Standard 8.2.b – Student outcomes: general education and Standard 9.3 – General education requirements in the Principles of Accreditation)*

Substantive Change Restriction

Additional or different requirements for institutions meeting defined criteria. The criteria are defined in the Substantive Change Policies and Procedures, and the additional or different requirements are identified for each substantive change type. These restrictions and the criteria for which institutions are affected are required by federal regulations.

Teach-out

The process and time period of a teach-out plan. *(See also closure, teach-out agreement, and teach-out plan)*

Teach-out plan: A written plan developed by an institution for students to complete their programs of study because it decided to end a program, off-campus instructional site, method of delivery, or close the institution. A teach-out plan provides an orderly process, the equitable treatment of students, minimal disruption and additional costs to students, and covers all enrolled students regardless of their progress to completion.

Teach-out agreement

An optional written agreement with an institution or entity under which students covered by a teach-out plan may complete their programs of study. A teach-out agreement may include student eligibility criteria, time limits, fee waivers, tuition parity, or other negotiated terms. *(See also closure, teach-out, and teach-out plan)*