



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 Policy, Standard 14.2, in adherence with 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 Office of Graduate and Postdoctoral Studies' 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 the SACSCOC, Tulane University is required to notify SACSCOC of institutional modifications in accordance with the substantive change policy 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.
- Awarding dual or joint academic awards.
- A substantial change in the number of clock or 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.
- Initiating programs by distance education or correspondence courses.
- Adding an additional method of delivery to a currently offered program.
- 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 or re-opening a program, off-campus site, branch campus, or Tulane University.

Other substantive changes:

- 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.
- Merging / consolidating two or more institutions or entities.
- 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 Policy 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, notifying SACSCOC and seeking SACSCOC's approval. The applicable procedure is dependent on the circumstances of the modification. As outlined in the SACSCOC [Substantive Change Policy 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 **fifteen (15) 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's approval is required to implement the modification. To make this determination, additional information may be requested from the Dean or Program Coordinator.
4. In order 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 Office of Graduate and Postdoctoral Studies' Graduate Council, when applicable; and the Tulane University Board of Administrators) 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 send 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's 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's 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 by SACSCOC and provided to the Registrar's Office 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 may be included in a catalog addendum as determined by the SACSCOC Liaison and the University Registrar.

If it is discovered that a modification 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 Policy.

Enforcement:

Failure to comply with SACSCOC's 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 Substantive Change Policy](#)

[SACSCOC Policy on Agreements Involving Joint and Dual Academic Awards](#)

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.

Additional location

See off-campus instructional site / additional location.

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 Substantive Change Policy 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

A method of delivery in which competencies are learned through interaction with faculty and an academic credential is earned based on what students demonstrate they can do. A competency is a well-defined statement of what a person can do as a result of learning. Progression and completion are measured by demonstrated attainment of competencies.

(See also competency-based education by course/credit-based approach, competency based education by direct assessment, and method of delivery)

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.

Competency-based education by direct assessment

Progression and completion of a program is based solely on demonstrating mastery of prescribed competencies. There are no academic terms (i.e., calendars), courses, or credit hours. Students progress through a program's competencies at their own pace within limits, if any, established by the institution. The academic transcript consists of successfully demonstrated competencies and the level of mastery attained.

Cooperative academic arrangement

An agreement between a SACSCOC-accredited institution and another entity (or entities) to Substantive Change Policy and Procedures – Page 83 deliver program content recorded on the SACSCOC institution's transcript as its own (see also Standard 10.9 (Cooperative academic arrangements) of the Principles of Accreditation). Examples include geographic or denominational consortia, statewide distance education agreements, collaborative agreements with international institutions, and contractual instruction.

Correspondence courses

Courses in which students and instructors are not in the same locations and in which instructional materials and learning assessments (such as examinations, assignments, creative works, etc.) are delivered electronically or by mail. Interaction between instructor and student is limited, is not regular and substantive, and is primarily initiated by the student. Courses are usually self-paced within limits.

Distance education

A method of delivery in which 50% or more of instruction occurs when students and instructors are not in the same location. It includes synchronous (live or in real-time) and asynchronous (not live or in real-time) instruction. *(See also method of delivery)*

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)*

Face-to-face instruction

A method of delivery in which 50% or more of instruction occurs when students and instructors are in the same location.

(See also method of delivery)

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 Policy 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) Standard 9.3 (General education requirements) of the Principles of Accreditation.

Substantive Change Restriction

Additional or different requirements for institutions meeting defined criteria. The criteria are defined in this policy 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 to close the institution. A teachout 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)*