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 regional 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.
- A substantial increase in the number of clock or credit hours awarded for successful completion of a program or significantly altering the length of a program.
- 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.
- Entering into a collaborative academic arrangement that includes the initiation of a dual or joint academic program with another institution.
- Closing a program, off-campus site, branch campus, or Tulane University.

Other types of substantive change:

- A change from credit hours to clock hours.
- Any change in the established mission or objectives of Tulane University.
- Any change in legal status, form of control, or ownership of Tulane University.
- The establishment of an additional location geographically apart from Tulane University’s main campus in New Orleans (i.e., an “off-campus site”) at which Tulane University offers at least 25% of an educational program. Compliance requirements differ depending on whether students can obtain 25-49% of credits toward a program at the off-campus site or 50% or more of credits toward a program at the off-campus site.
- The establishment of a branch campus.
- Acquiring another institution or a program or location of another institution.
- Adding a permanent location at a site where Tulane University is conducting a teach-out program for a closed institution.

Initiation of the Substantive Change Procedure:
The reporting and review of substantive change ensures that the scope of programs offered by Tulane University have 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 three SACSCOC procedures for addressing the different types of substantive changes, ranging from notifying SACSCOC to receipt of SACSCOC’s approval. The applicable procedure is dependent on the circumstances of the modification. As outlined in the SACSCOC policy statement “Substantive
Change for Accredited Institutions of the Commission on Colleges,” 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. This notification should occur at least fifteen (15) months prior to the anticipated modification implementation date and include a brief description of the modification. If the modification involves new or expanded programming or degree offerings, and 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. In order 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, or approval by, SACSCOC, the modification may be implemented at Tulane University upon SACSCOC’s verification of receipt of the notification. 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 Information
SACSCOC Substantive Change Policy
SACSCOC Policy on Agreements Involving Joint and Dual Academic Awards
Policy Definitions (as defined by SACSCOC):

Substantive Change
A significant modification or expansion of the nature and scope of Tulane University.

Branch Campus
A location of an institution that is geographically apart and independent of the main campus of the institution. A location is independent of the main campus if the location is: permanent in nature; offers courses in educational programs leading to a degree, certificate or other recognized educational credential; has its own faculty and administrative or supervisory organization; and has its own budgetary and hiring authority.

Contractual Agreement
Typically is one in which an institution enters an agreement for receipt of courses / programs or portions of courses or programs (i.e. clinical training internships, etc.) delivered by another institution or service provider.

Consortial Relationship
A consortial relationship typically is one in which two or more institutions share in the responsibility of developing and delivering courses and programs that meet mutually agreed upon standards of academic quality.

Cooperative Academic Arrangement
An agreement between a member institution and another entity (or entities) to deliver program content transcripted by the member institution as its own. Examples include geographic or denominational consortia, statewide distance education agreements, collaborative agreements with international institutions, and contractual instruction, among others.

Correspondence Education
A formal educational process under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor. Interaction between the instructor and the student is limited, is not regular and substantive, and is primarily initiated by the student; courses are typically self-paced.

Degree completion program
A program typically designed for a non-traditional undergraduate population such as working adults who have completed some college-level course work but have not achieved a baccalaureate degree. Students in such programs may transfer in credit from courses taken previously and may receive credit for experiential learning. Courses in degree completion programs are often offered in an accelerated format or meet during evening and weekend hours, or may be offered via distance learning technologies.

Direct Assessment Competency-Based Educational Programs
Federal regulations define a direct assessment competency-based educational program as an instructional program that, in lieu of credit hours or clock hours as a measure of student learning, uses direct assessment of student learning relying solely on the attainment of defined competencies, or recognizes the direct assessment of student learning by others. The assessment must be consistent with the accreditation of the institution or program using the results of the assessment.

Distance Education
A formal education process in which the majority of the instruction (interaction between students and instructors and among students) in a course occurs when students and instructors are not in the same place. Instruction may be synchronous or asynchronous. A distance education course may use the internet; one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber
optics, satellite, or wireless communications devices; audio conferencing; or video cassettes, DVD’s and CD-ROMS if used as part of the distance learning course or program.

**Dual Degree**
Separate program completion credentials each of which bears only the name, seal, and signature of the institution awarding the degree to the student.

**Educational program**
A coherent course of study leading to the awarding of a credential (i.e. a degree, diploma or certificate).

**Geographically separate**
An instructional site or branch campus that is located physically apart from the main campus of the institution.

**Joint degree**
A single program completion credential bearing the names, seals, and signatures of each of the two or more institutions awarding the degree to the student.

**Modified prospectus**
A prospectus submitted in lieu of a full prospectus for certain designated substantive changes. When a modified prospectus is acceptable, SACSCOC specifies requested information from the institution.

**Notification**
A letter from an institution’s chief executive officer, or his/her designated representative, to SACSCOC President summarizing a proposed change, providing the intended implementation date, and listing the complete physical address if the change involves the initiation of an off-campus site or branch campus. The policy and procedures for reporting and review of institutional substantive change are outlined in the document “Substantive Change for SACSCOC Accredited Institutions.”

**Significant departure**
A program that is not closely related to previously approved programs at the institution or site or for the mode of delivery in question. To determine whether a new program is a “significant departure,” it is helpful to consider the following questions: What previously approved programs does the institution offers that are closely related to the new program and how are they related? Will significant additional equipment or facilities be needed? Will significant additional financial resources be needed? Will a significant number of new courses be required? Will a significant number of new faculty members be required? Will significant additional library/learning resources be needed?

**Teach-out agreement**
A written agreement between institutions that provides for the equitable treatment of students and a reasonable opportunity for students to complete their program of study if an institution, or an institutional location that provides 50% or more of at least one program offered, ceases to operate before all enrolled students have completed their program of study. This applies to the closure of an institution, a site, or a program. Such a teach-out agreement requires SACSCOC approval in advance of implementation.

**Teach-out plan**
A written plan developed by an institution that provides for the equitable treatment of students if an institution, or an institutional location that provides 50% or more of at least one program, ceases to operate before all students have completed their program of study and may include, if required by the institution’s accrediting agency, a tech-out agreement between institutions. This applies to the closure of an institution, a site, or a program. Teach-out plans must be approved by SACSCOC in advance of implementation.