

Substantive Change Manual

A Guide to Substantive Change
Policies and Procedures

Accrediting Commission for
Senior Colleges and Universities

Western Association of Schools and Colleges

2009

2009 Substantive Change Manual

This document should be used in conjunction with the substantive change resources available on our website at:
www.wascsenior.org

Published by the Western Association of Schools and Colleges

985 Atlantic Avenue, Suite 100
Alameda, CA 94501

Telephone: 510.748.9001
Fax: 510.748.9797
wascsr@wascsenior.org

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Preface

WASC has required prior approval of institutional substantive changes in degree programs, methods of delivery, and organizational changes since 1979. In 1994 and then again in 2008, the Higher Education Reauthorization Acts led to a significant number of regulations concerning substantive change, and the U.S. Department of Education began requiring federally mandated site visits to off-campus programs and authentication of students enrolled in distance education programs.

The substantive change process is designed to ensure the consistency of quality across all institutional operations, on and off-campus and through distance education. The concern for quality has grown as off-campus programs have crossed regional and international boundaries, technology-mediated learning has flourished, and more institutions are beginning to offer both professional and research doctorates.

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 II: Substantive Change Policies*). The procedures defined in this *Substantive Change 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 resource materials that supplement this document may be found on the Substantive Change Resources page of the WASC Senior website.

The Commission welcomes suggestions for improvement of the material found in this Manual and ways to make this document and the substantive change process itself more useful to institutions. Please send all comments and suggestions to the WASC office or through the WASC website at: www.wascsenior.org.

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Introduction

How to Use this Manual

The primary objective of the *Substantive Change Manual* is to convey the policies and procedures of the substantive change process so that successful proposals will be submitted. The Manual is divided into four sections as outlined below, with a brief description of the content and general audience for whom the section is intended:

Section I: An Overview of the Substantive Change Process

This section contains a summary of the steps involved in the substantive change process and should be read by those new to the process.

Section II: Substantive Change Policies

This section defines the substantive change policies underlying the review process and should be read by those needing assistance in determining if a proposed change will require prior approval. This section also contains information on the Fast Track Authorization process for institutions with previous substantive change approvals and other WASC policies relevant to substantive change.

First-time users or those unfamiliar with the substantive change process are encouraged to read Sections I and II before submitting an application to WASC for a substantive change proposal.

Section III: Substantive Change Review Procedures

This section elaborates on each step of the process, summarized in Section I, and should be read by those who have not participated in a substantive change review.

Section IV: Substantive Change Site Visit Procedures

This section describes the various types of site visits associated with substantive change. The section provides details on the nature of the visit, required documentation for the visit, and other procedural items.

After submitting the application, Sections III and IV should be read regarding the substantive change review and visit processes.

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Section I: An Overview of the Substantive Change Process

This section contains basic information on the steps that an institution should follow to initiate the substantive change process.

Institutions may also refer to the process flow diagram on page 10 that graphically illustrates the steps involved, from the initial submission of an application to the final action on a proposal.

For more detailed information on each step within the process, please refer to *Section III: Substantive Change Review Procedures*.

Institutional Responsibilities

Determine Whether a Change is Considered Substantive

In determining whether a change is considered substantive, an institution should first refer to *Section II: Substantive Change Policies*. This section lists the categories and definitions of substantive changes requiring prior approval by the Committee (and possibly the Commission) before implementation. Determining the type of change is very important, as it is the basis for how an institution will navigate through the substantive change process.

Submit the Application at least Six Months Prior to the Anticipated Review Date

The next step in the process is for the Accreditation Liaison Officer (ALO) to complete a Substantive Change Application Form.

The form can be found on Substantive Change Resources page of the wascsenior.org website. It is recommended that the application be filed with WASC at least six months prior to the anticipated review date. The application will reserve a place on the Substantive Change Committee's agenda, which frequently fills up in advance.

It is important to consider the full timeframe for the anticipated review date. Please note that the substantive change must receive full approval from the Commission before an institution may implement the change. This approval usually occurs within three months of a successful Substantive Change Committee review.

Refer to the timeline provided on page 10. Please check with the WASC office as the availability of Committee review slots may vary.

Develop the Proposal

After submitting the application form and review fee, the ALO will receive a confirmation via email from the Substantive Change Manager. This email will contain important information regarding the steps involved in developing and submitting the proposal.

The ALO is responsible for disseminating this information to the institutional representatives drafting the proposal.

Submit the Proposal

The proposal must be received *60 days* in advance of the review date in order to confirm the calendared date with the Substantive Change Committee. Please note that all proposals must be submitted via WASC's online proposal submission tool. Appendices should be electronically attached to the respective section within the proposal.

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Before submitting the proposal to WASC, the ALO conducts a preliminary review to ensure that all required elements of the assigned template have been completed. Once submitted WASC staff will conduct a review to ensure the proposal is complete before forwarding it to the Committee.

Participate in a Conference Call on the Scheduled Review Date

For all substantive change proposals, a two-to-three person panel drawn from the Substantive Change Committee conducts the conference call review.

The ALO will be sent an email confirming the date and time of the review, as well as the dial-in information, at least two weeks prior to the call. The ALO should distribute this information to the other institutional representatives participating in the call and should send the names of those individuals to the Substantive Change Manager to include on the agenda.

Once on the call, the institutional representatives will be interacting with the panel and the WASC staff liaison. The institution should be prepared to answer any questions that the panel may pose regarding the proposal.

Address Requests by the Committee as Noted in the Formal Action Letter

Within five business days of the call, the WASC staff liaison will inform the ALO of the Committee's action. As per the Charge of the Substantive Committee, the panel will take one of the following actions:

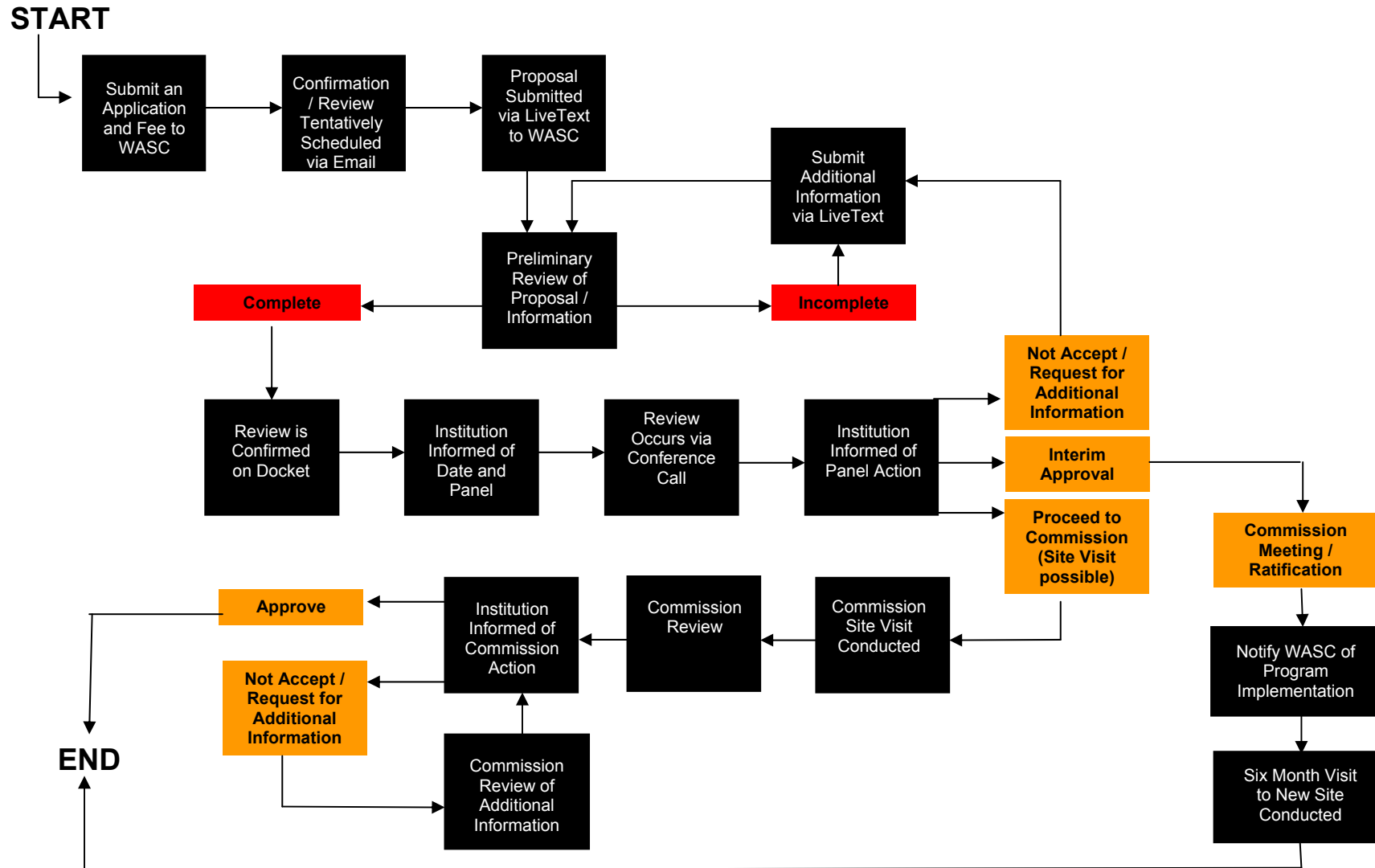
1. Interim Approval
2. Refer to Commission (with or without site visit)
3. Not Accept

A formal action report or letter will follow within a few weeks detailing the specifics of the Committee's review. The institution is responsible for addressing any requests made for additional information or follow-up as requested.

In all cases, final approval must be granted by the Commission before implementation of any substantive change can begin.

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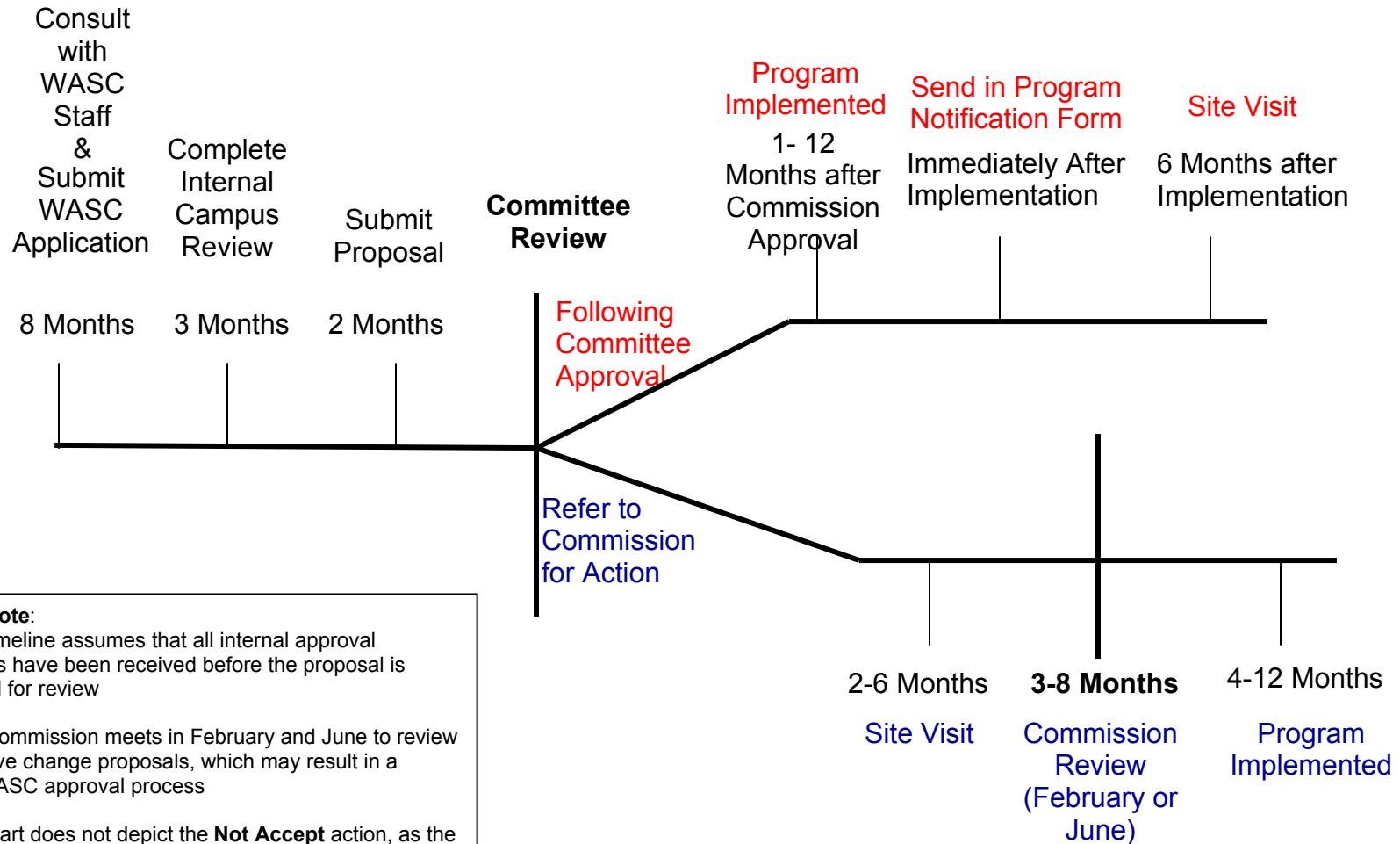
Substantive Change Process Flow Diagram



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Timeline for Substantive Change Review

Institutions should refer to the timeline provided below to determine the approximate length of the substantive change process.



Please Note:

1) The timeline assumes that all internal approval processes have been received before the proposal is submitted for review

2) The Commission meets in February and June to review substantive change proposals, which may result in a longer WASC approval process

3) The chart does not depict the **Not Accept** action, as the timeline will vary depending on the length of time that it takes an institution to respond to the request for additional information.

Section II: Substantive Change Policies

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, program, or programs of an institution does not adversely affect the capacity of the institution to continue to meet accreditation standards of its region. Importantly, the 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 at a degree or credential level above 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

Additionally, the federal regulations require regional accreditation substantive change policies to address: 1) distance education; 2) branch campuses; and 3) site visits.

- The addition of courses or programs that represent a significant departure, in terms of either in the content or method of delivery (i.e., distance education), from those that were offered when the agency most recently evaluated the institution
- 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, and
- The agency's procedures must include a [site] 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;

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The agency's procedures must also include:

- An effective mechanism for conducting visits at reasonable intervals to institutions that operate more than three additional locations; and
- An effective mechanism for conducting visits (at the agency's discretion) for ensuring that institutions which experience rapid growth in the number of additional locations maintain educational quality.

WASC Policies Concerning 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. It is further defined by federal regulations as described below.

The Commission's substantive change policies have been developed in response to concerns raised within the region by visiting teams, the Substantive Change Committee, and the Commission itself.

The concerns raised are:

- 1) the overall quality of distance education and off-campus programs;
- 2) distinctions between the 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;
- 3) capacity of the institution to offer programs at a higher or lower degree level than that previously offered by an institution; and
- 4) WASC accountability in responding to public inquiries about the comparability of quality and the accreditation status of these kinds of programs.

Non-Compliance with Substantive Change Policies

It is each institution's responsibility to develop internal procedures for assuring that it is in compliance with the Commission's substantive change policies and procedures, and that new sites or programs are not initiated without obtaining the necessary approvals.

Questions about whether a new program or site constitutes a substantive change should be addressed to Commission staff. Eligibility for federal financial aid is permitted for such off-campus and/or distance education programs or sites only if they are recognized and approved by the Commission through this process.

If the Commission determines that a site or program that needed prior approval has been initiated without such approval, ***the institution will be required to cease enrollments at that site or for that program until the necessary substantive change approval(s) have been obtained.*** If non-compliance occurs more than once, the matter shall be referred to the Commission for consideration of a sanction for the entire institution for violation of its responsibilities under Standard One, Institutional Integrity.

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If an institution is found to be in non-compliance more than once, the president of the institution will be notified and the institution will be required to submit a response with the following information, in addition to the substantive change proposal, 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 approvals.
- Audit of the institution's off-campus and distance education programs. Additional programs that are found to be in non-compliance 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 determines that the information requested above has been satisfactorily addressed, the matter will be forwarded to the Commission to determine if a sanction is warranted.

Degree Granting Authority

Please refer to the WASC Degree Level Approval Policy, which establishes guidelines for each category of degree granting authority.

Please note that only the Commission can change an institution's level of degree granting authority. This is outside the scope of the Substantive Change Committee. Contact your WASC staff liaison to determine the level of degree granting authority currently assigned to your institution.

An institution must seek prior approval before implementing a program at a degree level in which it does not have general degree granting authority. Even if an institution receives an approval for a program at a new degree level, it must continue to seek prior approval for all subsequent programs at this level until general (or specified) degree granting authority at that particular degree level is conferred.

WASC Categories of Substantive Change

WASC categorizes substantive changes by the level of review required to implement the proposed change. There are two levels of review:

Committee review—Changes involving alterations to traditional degree programs, such as online and off-campus programs

Committee and Commission review—Complex changes, such as a new degree level, or any change that spans beyond a particular program and may affect the institution, such as change in mission, ownership, etc.

Institutions are reminded that they should consult with their WASC staff liaison regarding the change being proposed, as the level of review not only relates to the type of change but also often to the context of the institution's accreditation history.

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Categories of substantive changes are defined and are organized by the required level of review necessary to obtain approval. Substantive change categories respond directly to the federal as well as Commission requirements. In some cases, the federal requirements have been reworded for clarification.

Changes Requiring Committee Approval

These types of changes may be categorized by modality, site, duration, or by degree scope or number. Each type of change requiring Committee approval is defined below.

New Modality: Distance Education

A distance education program is a program where 50 percent or more of a degree program is offered or anticipated to be offered via offered via satellite, Internet, or any other kind of technology-assisted medium. This definition does not refer to credential or certificate programs assuming that the credential or certificate does not lead to 50 percent or more of a degree program.

Refer to the WASC Senior website for more information on best practices in distance education.

New Site: Off-campus

For the purposes of this policy, types of sites are defined as any new location where 50 percent or more of a degree program is offered more than 25 miles from the home campus. A site visit is required by the U.S. Department of Education within six months after the implementation of new off-campus locations meeting this definition.

If the use of an off-campus site is suspended for more than two years and then reopened, an institution should consult with their WASC staff liaison to determine if the existing site would need to be re-reviewed by Committee. Institutions may call their off-campus sites branch campuses, satellite centers, extension programs, or other titles.

An off-campus program location is defined as a site where 50 percent or more of a degree program is offered more than 25 miles from the home campus or a WASC-approved **regional center**.

- Within the WASC region, more than 25 miles from the home campus; or
- Outside the WASC region (new sites or additional programs at a new or approved site)
- Internationally - Refer to the Substantive Change Resources page of the WASC Senior website for more information on best practices in international education programs.

This definition does not refer to credential or certificate program delivery locations assuming that the credential or certificate does not lead to 50 percent or more of a degree program.

A regional center is an expanded off-campus site that serves as an administrative and support center for additional sites, in addition to serving as a facility for off-campus programs. The development of a regional center may be most effective for institutions that plan to offer multiple off-campus programs within 25 miles of a proposed regional center.

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Development of a regional center allows an institution to open off-campus sites within 25 miles of the regional center without seeking prior approval from the Committee for each program or site. A specific review for approval of a regional center is required to achieve the exemption for additional sites.

Please note that distance education telecast locations are not considered to be new sites. Telecast locations fall under the distance education category described above.

Additional Off-campus Requirements:

1. The Department of Education requires that WASC maintain addresses of all off-campus sites. It is the responsibility of every accredited institution to report to WASC accurate and current addresses of all sites.
2. An approved off-campus site loses its status as a WASC-approved site if it is moved, and the change is not reported to WASC prior to or at the time of the move.
3. Changes of location for sites within 25 miles of the home campus or WASC-approved *Regional Center* do not have to be approved as substantive changes, but must be reported to WASC as stated above in item 2.
4. For off-campus sites more than 25 miles from the main campus, including *Regional Centers*: If the new location of the site is reasonably proximate to the approved site, and its character, services, and programs are not substantially different from the previously approved site, the new site does not have to be approved as a Substantive Change but can be reported as a change of address. No fee is charged for a change of address.

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 authority to offer the program. Partnering institutions must be regionally accredited, and international institutions must be recognized by the government in the respective country.

The partnering institutions should submit a MOU clearly articulating each institution's responsibility for academic and support services. If the partnering institution is not jointly conferring the degree, but is only offering support services to the institution, then the institution should adhere to the policy in the *Handbook of Accreditation on Contracts with Unaccredited Organizations*, and a MOU should be included in the proposal describing the nature of the support services.

Sites within 25 miles of the main campus, branch campus, or regional center do not require prior approval by the Substantive Change Committee, but must be reported to WASC using the Program Implementation form found on the WASC website.

Blended: New Site and Modality

A *Blended* program is defined as a program where 50 percent or more of a degree program is offered using a combination of off-campus and/or distance education. When the total of the off-campus and distance education components equal 50 percent or more of a degree program and neither of the modalities on their own exceed 50 percent, then the program is considered to be a blended program.

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If an off-campus site was approved and an institution wants to offer a blended program instead of the off-campus program, they may do so as long as less than 50 percent of the courses are available online.

Duration: Change in Length of Degree Program

Duration is defined as a substantial change in the number of clock or credit hours awarded for successful completion of a program or the length of a program.

If an institution chooses to change the required clock hours, credit hours, or program length, it should consult with its WASC staff liaison to determine a course of action for prior approval by the Committee.

New Degree Program

This category includes the addition of a degree program for which individual program review is required.

If an institution has been approved by the Commission to offer a program at a new degree level (bachelor's, master's or doctoral), it does not have blanket authority to continue to initiate other programs at that degree level without prior approval from both the Committee and Commission. Institutions will need to seek prior approval for all programs offered until the time the Commission grants the institution general or specific degree granting authority at that degree level.

Please refer to *Section II: Substantive Change Policies – Degree-Granting Authority* for more information on degree-granting authority or contact your WASC staff liaison to determine your institution's level of degree-granting authority, if unknown.

Note: The authority to approve a new level of degree-granting authorization is outside of the scope of the Substantive Change Committee and lies within the scope of the Commission.

Doctoral Degrees

In seeking approval to grant the doctorate, institutions will need to demonstrate an understanding of the distinctive character of doctoral education. This includes demonstrating that an institution possesses a doctoral culture, while maintaining institutional capacity and appropriate systems of educational effectiveness at the highest level of graduate education.

Proposals are required to define the nature and significance of the doctoral degree for the institution, and to provide a comprehensive analysis of institutional capacity to support student learning at this advanced level. The analysis should be presented in the context of institutional capacity and educational effectiveness of existing degree levels. Proposals should use the Standards 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 should be aligned with institutional purposes and educational objectives.
(Standard 1)*

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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 goals and 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 goal of developing scholars and practitioners at the highest level. Institutions will need to consider whether or not 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 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 or not the program has resources of appropriate quality and support in terms of faculty, library and information resources, and organizational support services to meet the requirements of the advanced degree.

Doctoral education requires processes for evaluating educational effectiveness. (Standard 4)

Institutions will 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.

Structural Changes Requiring Committee and Commission Approval

First Degree at a degree level

The first degree program offered at a degree level (bachelor's, master's, professional doctorate, research doctorate) is considered to be a structural change and therefore requires Committee and Commission approval.

Joint Degrees

A joint degree program is defined as a degree program that is offered in partnership between two or more accredited institutions. If one or more of the institutions involved does not have general degree level approval at the level of the proposed program, the joint degree program is considered a substantive change that must be approved in advance by WASC.

If the joint degree program is also the first degree program at a level for one or more of the institutions the change is considered structural in nature and will be reviewed by the Committee and the Commission.

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.

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The proposal for a joint degree program must be jointly developed by the partnering institutions, but should be submitted by the institutional partner that does not have general degree granting authority at the degree level being proposed or does not have a previous history or capacity to deliver 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 should be present for the conference call at the time the Committee reviews the proposal.

If a WASC-accredited institution wants to offer a joint degree program with another regionally accredited institution, prior approval is not required as long as the WASC member institution has the required level of degree-granting authority for the degree being offered and 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.

Institutions should consult with the WASC staff liaison with questions regarding any proposed joint degree programs and are encouraged to review Commission expectations regarding academic programs and degree requirements by consulting Standard 2 in the *Handbook of Accreditation*. While the whole Standard and Criteria for Review (CFR) provide a framework for institutional self-evaluation, Criteria for Review 2.1, 2.2, 2.3, and 2.4 provide guidelines that cover content, structure, nomenclature, and expectations for student achievement for baccalaureate and graduate degree programs.

An example of a proposal to offer a joint doctoral degree may be between a UC campus (with general degree granting authority at the doctoral level) and a CSU campus. In this instance, the CSU campus must submit a substantive change proposal in collaboration with the UC partner. A site visit is required for the first program at a new degree level before the proposal can be reviewed by the Commission.

Institutions may wish to refer to the *Handbook for the Creation of CSU/UC Joint Doctoral Programs* located at: www.ucop.edu/acadinit/uccsu/jointdochandbook030502.htm, when considering a joint doctoral program with a CSU or UC institution.

The Committee will accept reports such as those that have been filed with the California Postsecondary Education Commission (CPEC) or a system office, provided that supplemental information addressing all required elements as listed in the template are included. Please note that the proposal to WASC should be filed after being approved by CPEC, but can be filed prior to the CSU/UC Joint Graduate Board review. Once the final approval has been granted by the Chancellor of the CSU and the President of UC, WASC will need verification of that approval before sending out the formal action letter approving the program.

Organizational Change: Mission, Legal, or Control

Organizational changes are those that involve changes in legal status, control, or mission. Because this type of change impacts the institution in its entirety, it requires prior approval by both the Committee and the Commission.

- **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

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ownership, sponsorship, or affiliation, i.e., a merger with another institution or organization.

Merger

When an unaccredited institution merges with a WASC accredited institution, accreditation is not automatically assumed. Please consult with your WASC staff liaison for more information.

In accordance with the WASC **Policy on Institutions with Related Entities**, all substantive changes for a change in ownership involving a **related entity*** must submit the following information in addition to responding to the elements listed in the change in ownership proposal template.

- Acquisition Plan: The agreement, relevant filings with the U.S. Securities and Exchange Commission (if applicable), and a detailed plan for the acquisition by the new owner that demonstrates how the institution, under the new owner, will meet or continue to meet all eligibility requirements and accreditation standards. The principals of the acquiring entity must demonstrate the experience and expertise necessary to operate the institution, and if they operate other institutions, that they are in full compliance with all applicable laws, rules, and regulations.
- New Initiatives: Description of any new educational, growth, or other initiatives by the related entity or others anticipated to be planned within 12 months of the substantive change application that could materially affect the plans and/or operations of the institution (such as restructuring management or increasing enrollment). If such anticipated changes would constitute substantive changes (such as change of mission or addition of new locations), the change of ownership application should address these changes.
- Finances: Description of how the financial viability of the related entity and the institution are affected by the change of ownership, giving both entities the continuing capacity to meet changing financial needs of the institution.
- A completed **Certification of Related Entity** form found 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.

*Institutions are considered to have a related entity if their 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.

Site Visit

In accordance with federal regulations, a site visit must be conducted within six months following the completion of the change in ownership. The need for a site visit prior to the Commission meeting will be determined by the Substantive Change Committee.

Sanction

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If an institution has been issued a sanction by the Commission, then all new programs or organizational changes may be required to be reviewed by the Substantive Change Committee and approved by the Commission prior to implementation

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Substantive Change Categories

The information described in this section is summarized in a chart below. The chart lists the substantive change categories associated with each level of review, and informs the institution as to whether a site visit is required.

Type of Review*	Level of Review	Site Visit
NEW MODALITY**		
Distance Education: Satellite, Internet, or other technology-mediated delivery mode (50 percent or more of a degree program)	Committee Review	No
NEW SITE		
New site within region (less than 25 miles from home campus)	No Review Needed	No
New site within region (greater than 25 miles from home campus***)	Committee Review	Yes
New site outside WASC region	Committee Review	Yes
Same program as on campus, moved to new site within region (greater than 25 miles from home campus)	Committee Review	Yes
Same program as on campus, moved to new site outside region	Committee Review	Yes
New site within 25 miles from an approved off-campus site	Committee Review	Yes
New site located on the campus of another WASC-accredited institution	Committee Review	Yes
Relocation of home campus	WASC Staff Review	Contingent upon WASC Staff Review
	Committee Review Possible	

* Institutions are reminded that they should consult with their WASC staff liaison regarding the category of the change being proposed, as the category relates not only to the type of change but also to the institution's accreditation history and current status.

** Required by federal law to be reviewed at the time of the next comprehensive review.

*** If an institution is proposing to offer a program on the campus of another WASC-accredited institution, which is more than 25 miles from the home campus, it is considered a new site and subject to prior review by the Substantive Change Committee.

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Type of Review*	Level of Review	Pre Visit	Post Visit
REGIONAL CENTERS**			
New Regional Center	Committee Review	No	Yes
New site less than 25 miles from an approved regional center	No Review Needed	No	No
New site more than 25 miles from an approved regional center	Committee Review	No	Yes
APPROVED SITES			
Additional program at an approved site within the WASC region	No Review Needed	No	No
Additional program at an approved site outside the WASC region	Committee Review	Possible***	
BLENDED			
Blended: 50 percent or more of a degree program being offered using a combination of on- or off-campus and/or distance education	Committee Review	No	Yes
DURATION			
Substantial change in clock hours, credit hours or length of a program	Committee Review	No	No

* Institutions are reminded that they should consult with their WASC staff liaison regarding the category of the change being proposed, as the category not only relates to the type of change but also to the institution's accreditation history and current status.

** A regional center is an expanded off-campus site that serves as an administrative and support center for additional sites, in addition to serving as a facility for off-campus programs.

*** Determined by the Substantive Change Committee Panel.

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Type of Review*	Level of Review	Pre Visit	Post Visit
DEGREE LEVEL			
New programs-Individual Program Approval Required***	Committee Review Commission Action	Possible** Prior to Commission Action	
Joint doctoral degree programs****	Committee Review Commission Action	Possible** Prior to Commission Action	
ORGANIZATIONAL			
Change in mission or objective	Committee Review Commission Action	Yes Prior to Commission action	
Change in legal status or forms of control—merger, ownership, affiliation, sponsorship	Committee Review Commission Action	Yes Prior to Commission action	

* Institutions are reminded that they should consult with their WASC staff liaison regarding the category of the change being proposed, as the category relates not only to the type of change, but also to the institution's accreditation history, degree-level approval and current status.

** Determined by the Substantive Change Committee Panel.

*** Subsequent programs at a new degree level require Commission approval at the doctoral level; however, subsequent master's and baccalaureate programs may or may not be required to go to the Commission, based on the recommendation of the Substantive Change Committee and the WASC staff liaison. Also see policy on Degree Level Approval.

**** For joint master's or baccalaureate programs, please consult with your WASC staff liaison.

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FAST TRACK AUTHORIZATION

Definition

The Fast Track Authorization request, previously known as Systems Review, is a process that allows institutions the opportunity to demonstrate the capacity to effectively design, deliver, and evaluate a cluster of programs within a particular program modality or degree level so that such programs can be implemented over a four-year period without seeking prior approval from the Committee.

Once the Fast Track Authorization approval is granted, the institution obtains the authorization to submit Expedited Proposals that are reviewed by WASC staff. These abbreviated proposals receive accelerated review for substantive changes within the scope of the approval, and exemption from the six-month, post-implementation site visit.

However, at the end of the exemption period, a sampling of the sites implemented under the Fast Track Authorization is required to be visited, as per Department of Education regulations.

An institution may request Fast Track Authorization approval for Bachelor's or Master's degree programs, distance education, and/or off-campus programs at either the institutional level or the academic unit level (school, program, etc.).

A Fast Track Authorization request usually includes a proposal for the review of a specific program within the scope of the Fast Track Authorization request.

Relationship of a Fast Track Authorization to the Comprehensive Accreditation Review Process

A Fast Track Authorization proposal is required to demonstrate institutional capacity to deliver the proposed cluster of programs within the expectations of the *Handbook of Accreditation*, and in response to the specific elements requested in this *Substantive Change Manual*. Proposals must demonstrate that an institution can deliver programs of high quality and rigor in alignment with the Standards and Criteria for Review.

Advantages of a Fast Track Authorization

One of the tenets of the new framework of accreditation is to reduce institutional burden. Fast Track Authorization proposal offers advantages to institutions that have demonstrated a successful record of approved proposals and institutional capacity to implement additional programs. Such advantages are as follows:

Degree programs (within the scope of the Fast Track Authorization approval) may be implemented within a four-year period using an accelerated process that avoids full Substantive Change Committee approval for each program within the scope of the Fast Track Authorization approval.

Site visits are not required after the implementation of each new site. However, at the end of the exemption period, a sampling of the sites implemented under the Fast Track Authorization is required to be visited, as per Department of Education regulations. Programs may also be reviewed selectively or comprehensively during the comprehensive accreditation review process.

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Preparation of a Fast Track Authorization proposal, including data collection, can be useful in continuous institutional analysis of educational effectiveness of off-campus and distance education programs.

Fast Track Authorization Criteria

The Fast Track Authorization process is available to institutions that have been successful in implementing distance education and/or off-campus programs. An institution must not have any resource or capacity issues to be eligible for a Fast Track Authorization, and it must have consulted and received approval from the WASC staff liaison before preparing a Fast Track Authorization proposal.

A staff recommendation to develop a proposal is based on, but not limited by, whether an institution has been:

- 1) able to demonstrate significant experience in implementing off-campus and/or distance education programs normatively measured by three or more approvals by the Substantive Change Committee; and
- 2) accredited or reaccredited in its last comprehensive review without receiving a sanction or without having serious problems identified that affect the quality of off-campus and/or distance education programs.

Fast Track Authorization proposals should address the general elements noted in the Fast Track Authorization template and, depending upon the nature of the scope of the authorization being proposed, should also respond to the elements indicated within each distinct category of the template.

Expedited Review Process

Once an institution has been granted a Fast Track Authorization approval, future programs within the scope of the approved Fast Track Authorization require only a brief report to be submitted to WASC before program implementation. The report should describe the new program or site and indicate the capacity of the institution to offer the new program or site.

In cases where expedited proposals raise questions about programs falling outside the approved scope of the authorization, or where an institution's accreditation status has changed, i.e., has been placed on sanction, staff may recommend that the Committee provide an additional review.

The expedited report should be submitted using the electronic Expedite Review proposal template. The template addresses the following issues: 1) program title, location, start-date, modality of instruction and anticipated size; 2) learning outcomes; 3) plan for faculty and other support; 4) physical resources 5) budget (3-5 years); and 6) plan for assessment. 7) MOUs for off-campus programs are also required if academic or support services at the off-campus location are being provided by a third party.

An application for review and a nominal fee is required to be submitted to the WASC office before the program can be reviewed or implemented. Please refer to the WASC Senior website for the Schedule of Dues and Fees.

Expedited proposals are reviewed and approved by WASC staff, usually within 45 days of receipt.

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Fast Track Authorization Renewal Process

After the four-year period of exemption from Committee approval has terminated, an institution must submit a proposal to renew the authorization. The proposal should follow the guidelines for an initial Fast Track Authorization in an abbreviated format and should emphasize the lessons learned from the evaluation of several programs in the past four years. The proposal should also include updated documentation and assurances of financial resources (as demonstrated by budgetary commitment within the context of a business plan) and a reinforced plan for educational effectiveness.

Please note that the validity of the programs implemented during the four-year period of exemption does not need to be re-evaluated after the four-year period expires. The intent of the Fast Track Authorization renewal process is for the institution to continue to be able to implement future programs without prior approval from the Committee.

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Section III: Substantive Change Review Procedures

Submit the Application Six Months Prior to the Anticipated Review Date

Once an institution has determined that it intends to propose a substantive change, the first step is for the ALO to complete an application form located on the WASC website. The application should be mailed to the WASC office with payment, preferably at least six months prior to the desired date of the Committee review. The ALO will receive a confirming email from the Substantive Change Manager noting the tentative date of the Committee review and instructions for completing the appropriate proposal template using the online proposal submission tool.

The submission of the application and fee is the trigger to inform the WASC office that an institution wishes to be placed on the Committee docket.

Generally, applications are accepted on a first come-first served basis if the proposal is considered to be appropriate for Committee review. Institutions should consult with their WASC staff liaison, when necessary, to determine whether a proposed program or institutional change constitutes a substantive change.

To maintain the quality of the Committee review process, no more than six proposals can be considered per month. The Committee will consider two proposals per institution within the same review month. If the institution wishes to submit additional proposals, special approval is required. An institution may request a special meeting within the substantive change queue for special circumstances. The additional cost of the review will be charged to the institution.

Basic Guidelines for Submitting the Proposal

Submit the Proposal 60 Days Prior to the Anticipated Review Date

The proposal must be submitted to the WASC office 60 days in advance of the date of the scheduled review by the Committee. For the proposal to be calendared, an application must be on file, signed by the institution's ALO to ensure that the application is supported by the institution. Proposals submitted without fees will not be scheduled for review by the Committee.

Refer to the Schedule of Dues and Fees on the WASC website for the amount of the cancellation fee.

Internal Review

Before submission, all proposals must go through the appropriate internal institutional approval process. Proposals need to be approved by all internal entities, including the chief academic officer, the curriculum committee, and the faculty senate (where appropriate) before submission. It is also important for the institution to demonstrate that the faculty have been appropriately involved in approving the program, especially those involved in its delivery.

Where a proposed change needs to be approved by the board of trustees at an institution, the Committee would expect that board approval would have been obtained prior to the submission of an application. Should an institution wish to follow an alternative procedure of internal approval, the institution's WASC staff liaison should be consulted.

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In the case of a joint doctoral degree program, it is necessary to seek approval from all entities as listed previously at each institution named in the proposal. Also, the respective ALO from each institution must sign the application form to ensure that the proposal is supported by each of the institutions named in the proposal.

Developing the Proposal

This section serves as a guide to assist institutions in developing a substantive change proposal. Several substantive change templates have been developed to correspond specifically to each type of change. You will be informed of the template that you are to follow in the confirmation email described above. In that email, you will also receive a user's guide to the online proposal submission tool. Please follow the instructions within the guide and respond to each element within the template.

Proposals that the Committee has found to be of high quality are: 1) clear and responsive to each element; 2) linked to institutional mission and objectives; 3) supported by evidentiary finding and conclusions, i.e., market analysis; 4) demonstrative of the alignment between program and course learning outcomes; 5) based on planning processes that include key academic faculty, staff, and administration; and 6) illustrative of the financial capacity of the institution to sustain the program, i.e., budget.

Please note that the Substantive Change Committee has requested the right to remove any proposal from its docket if staff determines, after conducting a preliminary review of the proposal, that it is incomplete, i.e., required elements as defined in the templates are not addressed in the proposal. This preliminary staff review is designed to assist the institution in avoiding a not accept action by the Committee based on procedural grounds.

Proposals should answer all template questions in approximately 4000-5000 words and appendices should be attached to the appropriate section of the template.

The Review

In preparing for the proposal review, institutions will be interacting with WASC staff, the Substantive Change Committee, and possibly the Commission.

Working with WASC Staff

Each institution has been assigned a WASC staff liaison. The liaison should be consulted when development of a substantive change proposal is being considered. Communication between the WASC staff liaison and the proposal development team is important because it ensures that new program planning is integrated with institutional planning. The WASC staff liaison should also be consulted regarding proposal content-related questions.

All questions regarding the process or procedures outlined in this *Substantive Change Manual* should be directed to the WASC Substantive Change Manager who has coordinating responsibilities for all substantive change matters.

Please refer to the WASC staff directory found on the Substantive Change Resources page of the WASC Senior website to obtain contact information for these individuals.

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Interacting with the Committee Panel

Nature of the Committee Panel

The Committee is divided into panels for the review process so that the maximum number of proposals can be reviewed each month. A panel typically consists of two to three Committee members, who are assigned as readers for each substantive change proposal. Committee readers are chosen based on their expertise in the subject matter, their regional location, and their affiliation with a private or a public institution. Each proposal is assigned to a “primary reader” on the Committee. This individual facilitates the discussion and is responsible for determining what, if any, major issues need to be addressed with the institutional representatives. Other members may ask follow-up questions pertaining to any element outlined in the proposal, *Substantive Change Manual*, or Commission Standards. Institutional representatives should 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 response to the elements described in the proposal template. The Committee appreciates detailed information regarding: the planning and approval process; involvement of key faculty; support for, and training in, the use of technology, as appropriate; assessment of impact upon the broader institution; articulation of learning outcomes; and/ or, what an institution has learned from previous or similar programs that have been approved and implemented.

While the proposal should include this information, discussing the proposal with the Committee panel presents an opportunity for the institution to provide additional analysis or interpretation. The Committee is particularly concerned with the institution’s capacity to sustain the quality of the program, site or organization, including plans to evaluate student learning outcomes.

The panel reviews and assesses each proposal using a scoring rubric via the online evaluation process. Each panelist’s review is compiled and sent to the other panelist prior to the conference call. The panel uses these evaluations to guide them in their questioning during the conference call.

The Conference Call

On the scheduled date of the review, institutional representatives will participate in a conference call with the panel, as well as the WASC staff liaison. The conference call consists of a 30-to 40-minute discussion with the institutional representatives regarding the proposal. The Committee has found it particularly helpful to speak with a small team that represents various levels of institutional responsibility and association with the proposed program. This group may include a representative from the provost’s or dean’s office, the program director, and a key faculty member. Institutions may involve up to five representatives, with fewer rather than more being the norm.

Committee Actions and Communication with the Institution

The action of the Committee will be communicated to the ALO by email within a few days of the review date, and a more detailed letter explaining the Committee’s action will be sent within a

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few weeks of the review date. The Committee action may result in the need for additional institutional response, such as a report, site visit, or resubmission of a revised proposal.

The action letter received by the institution from WASC on behalf of the Committee will communicate any expectations for institutional response. The letter will be addressed to the ALO with a copy sent to the president of the institution.

In some instances, the Committee may identify concerns about an institution's policies or practices regarding its capacity to offer the proposed program. The Committee may restrict acceptance and approval of all forthcoming substantive change proposals until a focused capacity review by the institution has been submitted. In these cases, the Committee will outline the parameters of the focused capacity review, based on its interactions with the institution.

The Committee also reserves the right to recommend any proposal to be reviewed by the Commission for further analysis if it feels that an additional review is warranted.

An institution may submit a request for reconsideration of a panel action if the institution believes that the panel acted with bias. The institution must file for reconsideration within 21 days of receipt of the action letter. The reconsideration request should be sent to the Co-Chairs of the Committee with a copy to the WASC staff liaison, and should specify the grounds for the appeal.

The chart on the next page labeled *Substantive Change Committee Actions and Next Steps* provides an overview of the possible Committee actions, as well as the institutional and WASC follow-through associated with each action.

Appeal of Committee Decisions

If an institution's proposal or report is not accepted by a panel of the Committee, the institution may ask the panel to reconsider its decision, by way of a written communication sent within 30 days of the decision being communicated to the institution. The institution's communication should contain relevant information and the basis or bases for the requested reconsideration.

The panel that reviewed the institution's report or proposal will review the request and make a decision within 30 days of the date of the request, and this decision will be communicated promptly to the institution. If the panel does not reverse its initial decision, the institution may ask the Executive Committee of the Commission to reconsider the matter by way of a written communication in writing within 30 days of the date when the panel's denial of the request for reconsideration is communicated.

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.

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Substantive Change Committee Actions and Next Steps

Committee Action	Next Steps for Institution	WASC Next Steps
<p>Interim Approval</p> <p>In order to comply with federal regulations, all substantive change proposals must be ratified by the Commission. To ensure that WASC is in compliance with such regulations, we have developed a process whereby the Substantive Change Committee grants interim approval, with final approval taken in the form of ratification by the Commission at its next action meeting.</p>	<p>Prior to Commission Ratification:</p> <p>An institution may enroll students, who would be eligible for financial aid, even as the Committee's decision awaits ratification by the Commission.</p> <p>After Commission Ratification:</p> <p>Notify WASC of program or site start-up using the notification form for program implementation.</p> <p>If approval was for an off-campus program, then begin to plan for the six-month visit, unless waived.</p>	<p>After Commission Ratification:</p> <p>The institution will be notified of the Commission's action approximately two weeks after the date of the Commission meeting.</p> <p>Substantive Change Manager with ALO to schedule six-month visit for new sites.</p>
<p>Not Accept</p>	<p>Submit supplement containing the additional information requested (fee is required*)</p>	<p>Substantive Change Manager reviews report and schedules a follow-up conference call with the Committee.</p>
<p>Refer to Commission Site Visit Required</p>	<p>ALO works with the Substantive Change Manager in planning and scheduling a site visit, if required.</p> <p>After successful visit, await Commission review – Refer to the following section on Commission Review and Action.</p>	<p>Substantive Change Manager works with ALO to plan and schedule visit prior to Commission meeting</p> <p>After successful visit, proposal is placed on February or June Commission docket or Commission (Structural Change Panel) conference call scheduled for special circumstances.</p>
<p>Refer to Commission</p> <p>Action taken if a proposal requires Commission approval, but a site visit is not required.</p>	<p>Await Commission review – Refer to the following section on Commission Review and Action.</p>	<p>Proposal is placed on February or June Commission docket or Commission (Structural Change Panel) conference call scheduled for special circumstances.</p>

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Commission Review and Action

When Does a Commission Review Follow a Committee Review?

The Commission has determined that its approval is required for certain categories of substantive change. These include changes typically associated with changes in degree level or organizational changes. In such cases, the Committee receives and reviews the proposal, interacts with institutional representatives as with program-related substantive changes, requests a site visit, and makes a recommendation to the Commission. The Commission will then review the proposal, the team report from the site visit, and the Committee's recommendation; and then take action.

For planning purposes, it is important to anticipate whether or not a substantive change proposal will need to go to the Commission, as the Commission only meets in February and June to take action on substantive change proposals. In special circumstances, the Structural Change Panel may meet via conference call to review structural change proposals. Because the Commission needs to ratify the actions of the Structural Change Panel, generally within two weeks after a special meeting of the Structural Change Panel, a request will be sent to the full Commission via email for approval/ratification of all Structural Change Panel actions. After full Commission ratification, an institution may begin enrollments, and classes may commence.

Prior to Structural Change Panel review and Commission ratification, an institution may not begin offering courses for the program. However, the institution may advertise and admit students to the program with the disclaimer that the program is "pending WASC approval" if the Structural Change Panel has acted favorably on the proposal and that decision awaits ratification by the full Commission.

Please note that institutional representatives do not normally attend the Commission meeting at which substantive change proposals are considered.

Please refer to the chart in *Section II: Substantive Change Policies* that lists all substantive change types and indicates whether Commission review is required.

When Does the Committee Not Recommend Commission Review?

For organizational or degree-level changes, the Committee may, in some instances, determine that a proposal is not ready for Commission review. This type of Committee action usually occurs when a site visit (following the Committee review, but prior to Commission review) identifies significant issues and/or indicates a lack of evidence in addressing the concerns noted in the Committee's action letter. In such a case, an institution would be notified by its WASC staff liaison and the following may be requested:

- 1) an additional report or evidentiary materials;
- 2) another Committee review; and/or
- 3) an additional conversation with the institutional representative.

If, following the receipt and review of additional information, the proposal is still not ready for Commission review, then the Committee will take a not accept action.

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Guidelines for Developing Supplemental Reports

An institutional proposal may not be accepted by the Committee (or the Commission) and the institution will be asked to provide additional information to the Committee (or Commission) to supplement a section that was not fully developed in the proposal, or to respond to issues noted in the Substantive Change Committee action letter.

Additional reports should be no more than 10 pages in length. They are expected to be analytical and provide evidence that the institution has addressed the capacity or educational effectiveness concerns noted in the action letter.

Additional reports are reviewed by WASC staff, as well as Committee members, and are compared to the request for additional information to ensure that all information requested has been included in the report. If the report is found to be complete and the information contained within the report addresses the Committee's concerns, then the Committee (or Commission) will take action on the proposal.

Additional information is typically requested in the following areas:

- Financial Resources – Budget Projections
- Educational Effectiveness – Assessment Plan
- Curriculum - Learning Outcomes, Conceptual Design and Faculty Considerations
- Memorandum of Understanding – Final Signed Copy

A fee is applied to the review of additional information. Please consult the WASC website for the current Schedule of Dues and Fees.

Institutional Responsibilities after Receiving an Approval

Notification of Program Implementation Form

Under Standard One, it is the institution's responsibility to notify WASC when a program begins by using the program notification form. Failure to notify WASC of the program implementation date of any new off-campus or distance education program 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 off-campus/distance education program. Repeated non-compliance with this requirement could also lead to a sanction of the entire institution under Standard One. Notification of implementation dates should be made using the Program Notification Form found on our website.

If the substantive change is for an off-campus site, then this form is used as a trigger to schedule the six-month site visit required by the Department of Education. Please refer to *Section IV: Site Visit Procedures*, which describes the site visit requirements and process in detail.

Evaluation of Substantive Change Process

WASC requests that the ALO of the institution complete an online survey of the institution's experience with the substantive change process so that WASC and the Committee can continuously review and improve the process. The ALO may elect an institutional

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representative to complete this survey on his or her behalf. The link to the online survey will be sent to the ALO in an email containing an electronic copy of the action letter.

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Section V : Substantive Change Site Visit

A site visit is an arrangement whereby a team of Committee and/or institutional peers reviews a proposed new site to: 1) meet with institutional representatives, faculty, and/or students; 2) observe teaching and learning spaces; 3) seek additional information or perspectives; and 4) clarify issues or questions raised by the Committee. In some cases, the site visit may also include the home campus, branch campus and/or regional centers that provide administrative support or oversight of the site.

Six types of site visits exist for substantive changes:

- 1) Six-month visit required by the Department of Education for new sites or off-campus programs.

Department regulations require that approved off-campus programs or sites be visited six months following the initiation of the new program or site. The Department also requires a site visit to additional locations 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.

The six-month visit requirement is waived for international programs if the institution certifies that students enrolled in an off-campus program are not eligible for, and will not be seeking, U.S. federally funded financial aid.

- 2) International sites are required to be visited for the first location in a new country, according to WASC's policy on international site visits. The purpose of the visit is to ensure the quality of the international site and program(s) being offered at that site.
- 3) Six-month visit required by the Department of Education following a change in ownership.
- 4) Site visit requested by the Committee to review a substantive change requiring Commission approval. The site visit is to be scheduled before the Commission meeting at which the proposal will be considered.
- 5) Sampling of sites implemented during the Fast Track Authorization exemption.
- 6) Visit requested by the Committee or Commission staff for extenuating circumstances.

The Federally Mandated Six-Month Site Visit

The primary purpose of the six-month federally mandated visit is to verify the adequacy of the physical teaching site, learning resources, and support services.

Notification of Site Visit Requirement

The Committee action letter approving the new site will note that a federally mandated visit is required within six months of the program's initiation. The institution is responsible for informing the WASC office that a program at an approved site or off-campus program has been started.

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The ALO is responsible for sending the Notification of Program Implementation Form (found on the Substantive Change Resources page of the WASC Senior website) to the WASC office to the attention of the Substantive Change Manager. The Substantive Change Manager will then contact the ALO to plan and schedule the site visit.

Documentation for the Site Visit

The institution may be asked to submit a copy of the original proposal to the evaluator(s) if the evaluator(s) was (were) not part of the panel that reviewed the initial proposal for the site. The institution will also be asked to submit a brief update (not to exceed five pages) to the WASC office and to the evaluator(s) three weeks prior to the date of the visit.

Nature of the Site Visit

Typically, one team member will be sent to the new site for a visit. Depending on the location and type of program, the visit can run from morning to evening or from the afternoon on day one to the afternoon on day two. If the site offers an evening program, the noon-to-noon format will work best. The team member will interview the on-site coordinator, faculty, and students; and will complete a brief evaluation checklist, including any relevant comments on the site following the visit. Please refer to the checklist for the six-month site visit found on the Substantive Change Resources page of the WASC Senior website.

Report of the Site Visit

The evaluation checklist will be due in the WASC office within three weeks of the visit. Upon receipt, it is reviewed by the WASC staff liaison and retained in the institution's file. A copy will be sent to the institution for their files, including a letter confirming that the federally mandated visit has been completed.

Cost of the Site Visit

The evaluator expenses plus an administrative fee will be charged to the institution. Please refer to the WASC Senior website for the current fee schedule for site visits.

International Site Visit

Department of Education regulations do not require a visit to international locations if the institution verifies that students at that site will not be seeking U.S. federally funded financial aid; however, the need to ensure the quality at these international sites has been a concern of the Substantive Change Committee, and international site visits are now required for the first location in a new country.

Notification of Site Visit Requirement

The Committee action letter approving the new site will note that an international site visit is required one year after the program commences. The institution is responsible for informing the WASC office that a program at an approved international site has been started.

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The ALO is responsible for sending the Notification of Program Implementation Form (found on the Substantive Change Resources page of the WASC Senior website) to the WASC office to the attention of the Substantive Change Manager. The Substantive Change Manager will then contact the ALO to plan and schedule the site visit.

Documentation for the Site Visit

The institution may be asked to submit a copy of the original proposal to the evaluators if the evaluators were not part of the panel that reviewed the initial proposal for the site. A report to be sent to the evaluators and to the WASC office at least one month in advance of the visit is also required and should contain the following elements:

- Update on the program since the time of program approval
- Response to any concerns noted in the Substantive Change Committee action letter
- Implementation of the assessment plan for the first year
- Sample of student work (above average, average, and below average samples) - If the language of instruction is other than English, then these samples should be translated for the evaluators. If translation services incur a significant cost to the institution, then the institution should work with the WASC staff liaison to resolve the issue. Please refer to the *Policy on Instruction in Languages Other Than English*.

Nature of the Site Visit

The visit would typically occur one year after enrollment begins. An institution offering a finite program or year-long program is encouraged to work with its WASC staff liaison to explore alternative options. Theater or regional visits may be arranged to accommodate the review of multiple international locations in the same country or geographic area. International site visits will always involve two evaluators who will conduct the visit over a two-day period.

The evaluators will meet with administrators, faculty and students, as well as with any third party providers in the host country, to assess the quality of the program(s) being offered at the international site. The visit may be included as part of the Comprehensive Review if the Comprehensive Review is scheduled to occur within one year of the start of the program.

Report of the Site Visit

The report of the site visit will be due in the WASC office within three weeks of the visit. Upon receipt, it is reviewed by the WASC staff liaison and retained in the institution's file. A copy will be sent to the institution for their files.

The report for international sites should include the following items:

- Quality of the learning site in terms of the physical environment and appropriateness of the site to foster learning and dialogue between faculty and students
- Student support services in terms of the site's capacity for providing advising, counseling, library and computing services appropriate to the modality of delivery
- Connection of students and faculty to the institution in terms of the presence of the institution at the off-campus site, including how students receive an orientation to services and resources at the home campus

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- Organization of the institution to address student learning and educational effectiveness at this site - Does the institution demonstrate that standards and expectations of student learning are the same as for the home campus or appropriate to the local culture?
- Analysis of student work samples
- Examination of the impact of the international program on the home campus in terms of faculty, fiscal resources, etc.
- Nature of contractual relationships
- Credentials and review process for overseas faculty
- Verification of the language of instruction (Please refer to the *Policy on Instruction in Languages Other Than English*.)
- Recommendations for improvement

Cost of the Site Visit

The evaluator expenses plus an administrative fee will be charged to the institution. Please refer to the current Schedule of Dues and Fees.

Site Visit Following a Change in Ownership

A site visit following a change in ownership is a federal requirement. Six months after the change in ownership is complete, one to two evaluators will visit the institution to report on the institution's progress in terms of its financial and administrative capacity and educational effectiveness.

The evaluator(s) expenses plus an administrative fee will be charged to the institution. Please refer to the WASC Senior website for the current fee schedule for site visits.

Site Visit Prior to Commission Review

The primary purpose of a site visit prior to Commission review is to assess how the proposed substantive change will be implemented, to answer questions identified by the Committee, and to determine the overall impact of the change on the institution.

Notification of Site Visit Requirement

The Committee action letter will inform the institution about the site visit requirement. The Substantive Change Manager will contact the ALO to plan and schedule the visit prior to the Commission meeting. The Committee and WASC staff will determine the size and scope of the visiting team, and whether the team needs to have its membership augmented with disciplinary experts.

Documentation for the Site Visit

The institution may be asked to submit a copy of the original proposal to the evaluator(s) if the evaluator(s) was (were) not part of the panel that reviewed the initial proposal for the site. The institution will also be asked to submit a response to any issues noted in the Substantive Change Committee action letter to the WASC office and to the evaluator(s) three weeks prior to the date of the visit.

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Nature of the Site Visit

A small team (one to three members) will conduct the visit for one or two days. The team members will interview the on-site coordinator and faculty and, where possible, will observe a class of students.

Report of the Site Visit

The team chair will write a brief report (not to exceed five pages) following the visit. Please refer to the team report format guide found on the Substantive Change Resources page of the WASC Senior website. The team report will be due in the WASC office within three weeks of the visit. Prior to submitting the report to the WASC office, the Chair should send the report to the ALO of the institution for correction of factual errors. The final report will be distributed to the panel members that reviewed the initial proposal, and they will make a recommendation as to whether the report should be forwarded to the Commission based on the conference call review and results of the site visit.

If the panel acts to forward the proposal to the Commission, then the institution will receive a follow-up letter from the Substantive Change Manager confirming that a visit was conducted and that the proposal is being sent to the Commission for review. If the Committee believes that issues raised in the team report are significant, then the Committee may act to not accept the proposal. The WASC staff liaison will then send the institution an action letter detailing the issues identified in the team report.

Cost of the Site Visit

The evaluator expenses plus an administrative fee will be charged to the institution. Please refer to the WASC Senior website for the current fee schedule for site visits.

Fast Track Authorization Site Visit

To ensure the quality of educational sites implemented under an institution's Fast Track Authorization exemption, WASC will conduct visits to a sampling of sites implemented within the four-year interval of the Fast Track Authorization exemption.

The procedures for these site visits will follow those for the federally mandated six-month site visit.

Site Visit for Extenuating Circumstances

This type of site visit will typically follow the process and procedures listed for the site visit prior to Commission review; however, the process, however, may change, depending on the nature of the circumstances surrounding the proposed change or the state of the institution.

Index of additional resources:

Standards of Ethical Conduct (Committee Members)
Conflict of Interest Policy (Committee Members)
Language of Instruction Policy
Degree Level Approval Policy
Good Practices in Distance Education
Inter-Regional Accreditation
Principles of Good Practice in Overseas International Education Programs
Relating the Substantive Change Process to the Accreditation Process
Role of the Substantive Change Committee
Substantive Change Annual Report
Top 10 Stumbling Blocks for Substantive Change
Transfer of Accreditation

Forms:

Substantive Change Application Form
Implementation Notification Form (new programs or sites)
Change of Address for Off-campus Locations Form

Tools:

Online Proposal Submission and Evaluation User Guides
Preliminary Review Checklist
Substantive Change Site Visit Team Report Format

For more information please visit www.wascsenior.org/subchange