Substantive Change Manual

A Guide to Substantive Change Policies and Procedures

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Accrediting Commission for
Senior Colleges and Universities

Western Association of Schools and Colleges

This document should be used in conjunction with the substantive change resources available on our website at: www.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, 2008, and 2009, the Higher Education Reauthorization Acts led to a significant number of regulations concerning substantive change. Among the regulations adopted by the U.S. Department of Education were 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, and to ensure that institutions undergoing major changes continue to meet the Standards of Accreditation. The concern for quality has grown as off-campus programs have crossed regional and international boundaries, technology-mediated learning has flourished, more institutions are beginning to offer both professional and research doctorates, and more institutions are merging or affiliating with other institutions.

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 I: 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 in the Substantive Change Resources section of the Document Library on the WASC Senior website, www.wascsenior.org. Once in the Document Library, click on “Browse by Category” and choose “Substantive Change” from the pull-down menu.

The Commission welcomes suggestions for improvement of the material found in this manual and ways to make this document and the substantive change process 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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New in this Edition

Credit Hour Policy

Effective July 1, 2011, the US Department of Education passed regulations that established:

- a federal definition of the credit hour; and
- new requirements for regional accreditors to review and evaluate the accuracy of an institution's policies and procedures for awarding credit hours.

In response, WASC has developed a Policy on the Credit Hour, effective September 2, 2011. Questions regarding institutions' credit hour policies have been added to substantive change templates regarding credit hour requirements for new degree programs. More information about the new credit hour regulations may be found at http://www.wascsenior.org/resources/credithour.

Dual Degrees and Joint Degrees

WASC adopted new policies on Dual Degrees and Joint Degrees, effective July 1, 2011.

A dual degree program is defined as a program of study offered collaboratively by two or more institutions that leads to the award of a separate degree from each of the participating institutions.

A joint degree program is defined as a degree program that is offered in partnership between two or more accredited institutions that leads to the award of one degree.

Institutions have three years from the effective date of the policies to bring all existing dual and joint degree programs into compliance. This manual contains guidelines about when these degree programs require substantive change approval. Institutions currently offering dual or joint degree programs, or planning new ones, should consult these policies to ensure that the programs comply with the new policies, including substantive change policy.

Fast Track Authorization for Modality Change

WASC has implemented an expedited process for the review of existing degree programs that are being converted to distance education or being started at a new off-campus location. Institutions may be eligible for the expedited process if:

- The institution has had three or more substantive change approvals in the modality requested (either distance education or off-campus);
- These programs have been in operation for at least one year; AND
- The institution receives the recommendation of its WASC staff liaison.

This is similar to our current Fast Track process, except that institutions are not required to submit a proposal requesting Fast Track authorization. This authorization does not apply to international programs or doctoral level programs unless the institution has General degree level approval at the doctoral level. See "Fast Track Authorization for Change of Modality" under the "Fast Track Authorization" section of this manual for more information.

SECTION I: Substantive Change Policies

Commonly Asked Questions about Substantive Change

What is 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.

Why does WASC review Substantive Changes?
WASC needs to assure itself that such changes are made in keeping with the Standards of Accreditation. In addition, Substantive Change review procedures are mandated by the Department of Education. The federal regulations governing Substantive Change may be found in Appendix A.

What types of changes are considered substantive?
The following types of changes are considered substantive, categorized by the level of review required to implement the change.

A *Committee Review* requires review and approval by a panel of the Substantive Change Committee prior to approval by the Commission. These changes include:

- New degree programs
- New off-campus locations (50% or more of a degree program offered more than 25 miles from the main campus or regional center)
- New distance education or correspondence education programs (50% or more of a degree program)
- A change in the length of a degree program
- Joint or dual degrees

A *Committee and Commission Review* (also referred to as Structural Change) is a more complex change that requires review by a panel of the Substantive Change Committee, a site visit (unless waived), and review by a panel of the Structural Change Committee of the Commission, prior to being approved by the Commission. These include:

- Degree program offerings at a new degree level (including joint degrees)
- A change in mission, ownership or control

How far in advance of my implementation date should I submit a Substantive Change application?
Institutions are encouraged to submit the Substantive Change application and fee *at least* nine months prior to the planned implementation date of the change to ensure a spot on the review calendar and to provide adequate time for review and approval by the Commission. Structural changes typically take approximately two months longer to complete. Institutions should plan accordingly because programs cannot be started without WASC approval.

Who reviews my proposal?
Proposals are reviewed by WASC staff and members of the Substantive Change Committee, who are peer reviewers from member institutions chosen for their areas of expertise. Structural Change proposals are also reviewed by members of the Structural Change Committee of the Commission.

How can I determine if a change requires approval?
This manual outlines the policies and procedures that govern substantive change. However, if you are uncertain whether a proposed change requires prior approval, contact your WASC staff liaison or the Substantive Change Manager prior to implementing the program.

WASC Substantive Change Policy

The Commission's substantive change policies have been developed to ensure that new programs, modalities and other important changes are made in keeping with the Standards of Accreditation.

Some of the issues that the policies are designed to address 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.

4. WASC accountability in responding to public inquires about the comparability of quality and the accreditation status of these kinds of programs.

5. The increase in institutional changes of control and ownership, and in collaborative offerings between institutions.

DEGREE-LEVEL APPROVAL POLICY

The Commission has established three categories of degree-level approval for the purposes of accreditation and substantive change processes: General, Specified, and Individual. These designations determine whether certain kinds of new degree program offerings have to be approved through the substantive change process.

Each institution is designated by the Commission as having one of the three categories of approval at each degree level: associates, bachelor's, master's, professional doctorate, and research doctorate. Please refer to the WASC's Policy on Degree-Level Approval, which establishes guidelines for each category of degree-granting approval.

An institution must seek prior approval before implementing any degree programs at a degree level at which it does not have General or Specified (in a particular field or discipline) degree-granting approval.

Please note that only the Commission can change an institution's level of degree-granting approval. This is outside the scope of the Substantive Change Committee. Contact your WASC staff liaison or the Substantive Change Manager if you have questions about the level of degree-granting approval currently assigned to your institution.

Distance Education and Degree Level Approval
Federal regulations require that all programs in which 50% or more of the program will be offered via distance education must obtain substantive change approval prior to their implementation, regardless of the institution's degree level approval.

INSTITUTIONS ON SANCTION

If an institution has been issued a sanction by the Commission (Warning, Probation, or Show Cause), all new programs or organizational changes must be reviewed by the Substantive Change Committee and approved by the Commission prior to implementation, regardless of the institution's degree level approval status.

Categories of Substantive Change

WASC categorizes substantive changes by the level of review necessary to obtain approval. These categories respond directly to federal as well as Commission requirements. There are two levels of review:

Committee review—Addition of new degree programs or changes involving alterations to delivery methods of existing degree programs, such as online and off-campus programs, including:

- New degree program at a degree level for which the institution does not have General or Specified degree-granting approval. (Please see section on Degree-Level Approval Policy above for more information).
- New modality—distance education or correspondence education
- New off-campus site (50% or more of a degree program is offered at a location more than 25 miles from the main campus or an approved regional center)
- New regional center
- Change in length of a degree program (typically an increase or decrease of 25% or more)
- New degree program in which 25% or more of the program will be delivered by an institution or organization not certified to participate in Title IV, HEA programs.
- Dual degree program (see Dual Degree Programs below for more information)
- Joint degree program (see Joint Degree Programs below for more information)

Committee and Commission Review (Also referred to as Structural Change)— Complex changes that reach beyond a particular program and affect the institution as a whole, including:

- First degree at a degree level at which no programs have been offered
- Joint degree, if new degree level for either institution
- Change in mission
- Change in legal status
- Change in ownership or control, including mergers and acquisition

Institutions are reminded to consult with their WASC staff liaison regarding the change being proposed. The liaison can confirm the appropriate category of the change and identify any restrictions or additional requirements on substantive change that have been imposed on the institution by the Commission.

Changes Requiring Committee Review

Substantive change proposals require the following steps:

- Review and approval by the Substantive Change Committee
- Approval by the Commission

Note that some substantive changes also require review by the Structural Change Committee. See the section below on Changes Requiring Committee and Commission Review. For a detailed description of the review process, see Section II of this manual

NEW DEGREE PROGRAM

This category includes the addition of a degree program at institutions with Individual or Specified (as appropriate) degree-granting approval. (Please refer to the section on Degree-Granting Approval above for more information, or contact your WASC staff liaison to determine your institution's level of degree-granting approval, if unknown.)

If an institution has been approved by the Commission to offer a programs at a degree level (Associate's, Bachelor's, Master's or Research Doctorate, Professional Doctorate), it does not necessarily have blanket authority to initiate other programs at that degree level without prior approval from both the Substantive Change Committee and the Commission. Institutions with Individual degree-granting approval will need to seek prior approval for all programs offered until the time the Commission grants the institution General or Specified degree-granting approval at that degree level.

Note: The ability to change an institution's degree-granting approval is outside of the scope of the Substantive Change Committee. Institutions should speak with their WASC staff liaison if they believe a change of approval designation is warranted.

Re-Starting a Program
A previously approved degree program that has not been offered for at least two years may require substantive change approval to be offered again. Please consult with your WASC staff liaison to determine if the program needs approval.

Table 1: Substantive Change Categories

The information described in this section is summarized in below. The table lists the substantive change categories associated with each level of review and indicates whether a site visit is required. For more information on site visit procedures, see Section IV of this manual.

	TYPE OF REVIEW	LEVEL OF REVIEW	SITE VISIT
NEW PROGRAM	New Degree Program[1] (On-Campus)	Committee Review	No
	New Distance Education or Correspondence Education Program (50% or more of degree program)	Committee Review[2]	No
	Dual or Joint Degree Program[3]	Committee Review[2]	No
NEW SITE	New Site (less than 25 miles from home campus or WASC-recognized regional center)	No review required	No
	New Site (more than 25 miles from home campus or WASC-recognized regional center)	Committee Review	Post-implementation visit may be required within six months of implementation
	New International Site	Committee Review	Post-implementation visit may be required within one year of implementation
	New Regional Center	Committee Review	Post-implementation visit may be required within six months of implementation
OTHER	Fast Track Authorization: Modality or Degree Level (Granted for Five Years)	Committee Review	For off-campus programs, sampling of sites will be visited during comprehensive review
	Duration: Change in Length of Degree Program	Committee Review	No
DEGREE LEVEL	First Degree Program at a New Degree Level (including joint degree)	Committee and Commission Review (Structural Change)	Pre-implementation visit may be required
ORGANIZATIONAL	Change of Mission, Legal Status or Form of Control	Committee and Commission Review + Possible Legal Review (Structural Change)	Pre-implementation visit may be required Post-implementation visit may be required within six months of implementation

1 For institutions with Individual (I) Degree-Level Approval designation and for those with the Specified (S) designation that are seeking to offer a program outside the scope of their approval.

2 If the program is also the first program at a new degree level, the proposal would be reviewed by the Committee and the Commission (Structural Change.)

3 See sections in this manual on Dual Degree Programs and Joint Degree Programs for more information on approval requirements.

Special Requirements for Doctoral Degrees

Institutions that do not have General designation to offer doctoral programs must seek approval of those programs and demonstrate an understanding of the distinctive character of doctoral education. This includes demonstrating that an institution supports a doctoral culture, while maintaining institutional capacity and appropriate systems of educational effectiveness at the highest level of graduate education.

Proposals must define the nature and significance of the doctoral degree for the institution and 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 of Accreditation 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)
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 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 special processes for evaluating educational effectiveness. (Standard 4)
Institutions 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.

DISTANCE EDUCATION AND/OR CORRESPONDENCE EDUCATION

All distance education or correspondence education programs in which **50 percent or more of the degree program hours** are offered in this modality must receive prior approval by the

Substantive Change Committee. Note that for undergraduate programs the 50-percent rule applies only to the program hours in the major, not the total hours it takes to graduate with a degree.

Distance Education is defined as: education that uses one or more of the technologies listed in items (1) through (4) below to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously. The technologies may include:

1. The internet.
2. One-way or two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communication devices.
3. Audio conferencing.
4. Audio cassettes, DVDs, and CD-ROMs, if the cassettes, DVDs, or CD-ROMs are used in a course in conjunction with any of the technologies listed in paragraphs (1) through (3).

Refer to the Guidelines for the Evaluation of Distance Education in the Document Library on the WASC Senior website (www.wascsenior.org) for more information on best practices in distance education.

Correspondence Education is defined as:

1. Education provided through one or more courses by an institution 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.
2. Interaction between the instructor and the student is limited, is not regular and substantive, and is primarily initiated by the student.
3. Correspondence courses are typically self-paced.
4. Correspondence education is not distance education.

Verification of Student Identity

In keeping with federal policy, WASC requires institutions that offer distance or correspondence education to have processes in place through which the institution establishes that the student who registers in a distance education or correspondence education course or program is the same student who participates in and completes the course or program and receives the academic credit. To meet this requirement, the institution must employ methods to verify the identity of the student who participates, such as:

(1) A secure log-in and pass code
(2) Proctored examinations
(3) New or other technologies or practices that are effective in verifying student identification.

In so doing, the institution must make clear in writing at the time of enrollment or registration that it uses processes that protect student privacy and must notify students of any additional charges associated with the verification of student identity.

OFF-CAMPUS SITE or REGIONAL CENTER

WASC recognizes two types of off-campus program sites: *off-campus program locations* and *regional centers*. Sites that meet the criteria listed below must receive prior approval by the Substantive Change Committee. Please note that distance education telecast locations are not

considered to be new sites. Telecast locations fall under the distance education category described above.

Note: The Department of Education requires that WASC maintains addresses of all off-campus sites, regardless of their distance from the main campus. It is the responsibility of every accredited institution to report to WASC accurate and current addresses of all sites.

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 (as the crow flies) from the home campus or a WASC-approved regional center (see definition below). This includes sites that are:

- Within the WASC region, more than 25 miles from the home campus; or
- Outside the WASC region but in the U.S. (new sites or additional programs at a new or approved site); or
- International. (Refer to Principles of Good Practice in Overseas International Education Programs in the Document Library on the WASC Senior website (www.wascsenior.org) for more information on best practices in international education programs.)

A ***regional center*** is an expanded off-campus site that may serve 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. Development of a regional center allows an institution to open additional 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.

Once a site or regional center is approved with at least one degree program, an institution may offer any other existing on-campus programs at that site without prior substantive change approval. Institutions may call their off-campus sites branch campuses, satellite centers, extension programs, or other titles.

New Sites within 25 Miles of Main Campus or Regional Center
Sites within 25 miles of the main campus or regional center do not require prior approval by the Substantive Change Committee, but must be reported to WASC within 30 days of implementation using the Program Implementation form found in the Document Library on the WASC website.

Partnerships with Other Institutions
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 approval to offer the program.

With its proposal, the institution must submit a Memorandum of Understanding (MOU) or comparable document that clearly articulates each institution's responsibility for academic and support services. The arrangements must adhere to the policy in the WASC's policy on Contracts with Unaccredited Organizations.

Credential or Certificate Programs at Off-campus Locations
Sites offering only credential or certificate programs that do not comprise 50 percent or more of a degree program do not need to be approved by WASC.

Site Visit Requirement
A site visit may be required within six months after the implementation of new off-campus locations that require substantive change approval. Typically, the first three off-campus sites implemented by an institution must be visited. See Section IV: Substantive Change Site Visits for more information.

Re-opening a Site
If an off-campus site or regional center is closed for more than two years and the institution wishes to reopen it, the site may require substantive change approval. Institutions should contact the WASC staff liaison to determine if the site needs to be approved prior to re-opening.

Moving a Site
An approved off-campus site or regional center 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.

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 on the Change of Address Form found in the Document Library on the WASC Senior website.

For off-campus sites *more than 25 miles* from the main campus or approved regional center: If the new location is within five miles of the previous site, and its character, services, and programs are not substantially different from the previously approved site, the new site does not need to be approved, but must be reported as a change of address. Sites moved more than five miles may require approval. Please consult with your WASC staff liaison to determine whether the change of location requires approval.

No fee is charged for a change of address that does not require prior approval.

Closing a Site
WASC policy requires substantive change review and approval if an institution intends to cease operations entirely or close a site that offers 100 percent of at least one degree program. For more information, see the Teach-Out Plans and Agreements Policy, available in the Document Library on the WASC website.

Teach-Out Agreement with Another Site
If an institution determines that one or more programs will be taught out and enters into an agreement with another institution to teach-out its programs, the matter must receive substantive change approval prior to implementation. If the partner institution plans to establish a new off-campus location that will operate beyond the terms of the teach-out, the location is also subject to substantive change review. See the Teach-Out Plans and Agreements Policy, available in the Document Library on the WASC website.

BLENDED PROGRAM: New Site and Modality

The Blended degree category has been eliminated. In general, institutions are required to seek approval for all the modalities through which such a program is being offered. For example, if the

program is offered through a combination of off-campus instruction and online instruction, the institution must seek approval for both modalities. Institutions should consult with the Substantive Change Manager to determine the appropriate type(s) of substantive change approval required for programs being offered in multiple modalities.

JOINT DEGREE PROGRAM

A joint degree program is defined as a degree program that is offered in partnership between two or more accredited institutions that leads to the award of one degree. 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.

If a WASC-accredited institution is seeking to offer a joint degree program with an institution accredited by another regional accrediting agency, prior approval is not required as long as the WASC member institution has the required level of degree-granting approval 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.

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 approval 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.

Institutions should consult with their WASC staff liaison with questions regarding proposed joint degree programs and are encouraged to review Commission expectations regarding academic programs and degree requirements by consulting WASC's Policy on Joint Degrees Offered Collaboratively by Two or More Institutions and Standard 2 in the Handbook of Accreditation. While the Standards of Accreditation and the Criteria for Review (CFR) as a whole provide a framework for institutional self-evaluation, Criteria for Review 2.1-2.4 provide guidance on content, structure, nomenclature, and expectations for student achievement for baccalaureate and graduate degree programs.

DUAL DEGREE PROGRAM

A dual degree program is defined as a program of study offered collaboratively by two or more institutions that leads to the award of a separate degree from each of the participating institutions. Dual degree programs require prior approval if:

- The partner institution(s) is not accredited by a DOE-recognized accrediting agency; or
- Either institution is not authorized to offer degree programs at the degree level without seeking prior substantive change approval.

If the program represents a new degree level for either institution, 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 dual 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.

All dual degree programs must comply with WASC's Policy on Dual Degree Programs Offered Collaboratively by Two or More Institutions, available in the Document Library on the WASC website.

DURATION: Change in Length of Degree Program

Duration is defined as a substantial change (typically 25% or more) 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 or the Substantive Change Manager to determine a course of action for prior approval by the Committee.

CONTRACTS WITH UNACCREDITED ORGANIZATIONS

Federal regulations require that new degree programs in which more than 25 percent of the program (in any modality) will be delivered under contract with an institution or organization not certified to participate in Title IV, HEA programs may require staff review or substantive change approval prior to their implementation. However, WASC policy does not allow institutions to contract out services related to the academic or fiscal elements of their programs. Institutions considering this kind of arrangement should review WASC's policy on Contracts with Unaccredited Organizations and consult with their WASC staff liaison or the Substantive Change Manager for more information.

Fast Track Authorization

Fast Track Authorization (previously known as Systems Review) allows institutions to implement programs within a particular modality or degree level over a five-year period without seeking prior approval from the Substantive Change Committee. To be granted authorization, institutions must demonstrate the capacity to effectively design, deliver, and evaluate programs in the

modality or level requested. The Fast Track Authorization Criteria (below) outline institutional eligibility for this type of approval. Institutions should consult with their WASC staff liaison prior to submitting a proposal for Fast Track Authorization to ensure that they are eligible.

Categories of Fast Track Authorization
Institutions may request Fast Track Authorization for:

- Bachelor's or Master's degree programs
- Distance education or correspondence education
- Off-campus programs at either the institutional level or the academic unit level (i.e., school, program, etc.)
- **NEW:** Change of Modality—conversion of an existing program to a new modality (distance ed or off-campus) (See "Fast Track Authorization for Change of Modality" section below for specific requirements regarding this authorization.)

A separate authorization is required for each type of approval. A Fast Track Authorization request is submitted simultaneously with a proposal for a specific program within the scope of the Fast Track Authorization request.

Fast Track Authorization Criteria

The Fast Track Authorization process is available to institutions that:

- Have been successful in implementing the programs at the degree level and/or modality for which they are seeking authorization;
- Do not have any resource or capacity issues that affect their eligibility for a Fast Track Authorization; and
- Have consulted and received approval from the WASC staff liaison before applying for Fast Track Authorization.

Note that a change of ownership or control during the authorization period will require a new Fast Track Authorization application and approval by the Substantive Change Committee.

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

- Demonstrated substantial experience in implementing the degree level or modality for which approval is sought, such as off-campus and/or distance education or correspondence programs, normatively measured by **three or more approvals by the Substantive Change Committee**;
- Been accredited or reaccredited in its last comprehensive review without a sanction being imposed and without serious problems identified that affect the quality of off-campus and/or distance or correspondence education programs; and
- Been accredited for at least 10 years.

NEW: Fast Track Authorization for Change of Modality
Institutions may now apply for Fast Track Authorization to convert <u>existing</u> on-campus programs to another modality (distance education or off-campus). Institutions are eligible for the expedited process if:

- The institution has had three or more substantive change approvals in the modality requested (either distance education or off-campus);
- These programs have been in operation for at least one year; AND
- The institution receives the recommendation of your WASC staff liaison.

This is similar to our current Fast Track process, except that institutions will not be required to submit a full proposal requesting Fast Track authorization. To apply, submit the Fast Track Modality Change Application. Once the authorization is granted, institutions will use the Expedited Review proposal process. Proposals will be reviewed by WASC staff within 45 days. There is no expiration date for this authorization.

This authorization does not apply to international programs, new degree programs that do not already exist on-campus or at another approved off-campus location, or doctoral level programs unless the institution has General degree level approval at the doctoral level.

Contact the Substantive Change Manager if you have questions about your institution's eligibility for this process.

Advantages of a Fast Track Authorization

Fast Track Authorization offers advantages to institutions that have successfully demonstrated a record of approved proposals and institutional capacity to implement additional programs, including:

- Once Fast Track Authorization is granted, the institution submits abbreviated **Expedited Review** proposals, reviewed within 45 days of receipt by WASC staff only, with no committee review. (For more information, see Expedited Review Process below.)

- For off-campus sites: **Site visits** are not required after the implementation of each new site. However, at the end of the authorization period, a sampling of the sites implemented under the Fast Track Authorization is required to be visited, per Department of Education regulations. Programs will be reviewed selectively or comprehensively during the comprehensive accreditation review process.

- 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.

- Expedited Review proposal fees are substantially lower than the fees for proposals reviewed by the full committee, making this a **cost-effective** alternative for institutions implementing a number of programs within a five-year period.

Expedited Review Process

Once Fast Track Authorization has been granted, the institution submits Expedited Review proposals for programs within the scope of the authorization. These proposals are submitted (through LiveText) to WASC for staff review before program implementation.

The Expedited Review proposal addresses the following issues:

- Program title, location, start date, modality of instruction. and anticipated size
- Learning outcomes
- Plan for faculty and other support
- Physical resources
- Budget (three to five years)
- Plan for assessment

- MOUs for off-campus programs (required to verify arrangements for the site and if academic or support services at the off-campus location are being provided by a third party)

In cases where Expedited Review 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), WASC staff may request additional information and/or refer the proposal to the Substantive Change Committee for an additional review.

An application and fee must be submitted to the WASC office before an Expedited Review proposal will be reviewed. Please refer to the Document Library on WASC Senior website for the Schedule of Dues and Fees.

Renewal of Fast Track Authorization

Before the five-year authorization period has expired, an institution may submit a proposal to renew the authorization. The proposal for a renewal of Fast Track should emphasize the lessons learned from the evaluation of several programs implemented during the previous authorization period. The proposal should also include updated documentation and assurances of continued financial resources (as demonstrated by budget projections) and a renewed plan for educational effectiveness.

Please note that the programs implemented during the authorization period do not need to be reviewed after the authorization 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.

Changes Requiring Committee and Commission Review (Structural Changes)

Structural change proposals require the following steps:

- Review and approval by the Substantive Change Committee
- A pre-implementation site visit (unless waived)
- A review by the Structural Change Committee of the Commission
- Approval by the Commission.

Some structural changes also require a follow-up site visit six months after implementation. Please note that structural change reviews generally take at least two months longer to complete than reviews conducted only by the Substantive Change Committee. See Section II of this manual for a detailed description of the review process.

FIRST DEGREE AT A DEGREE LEVEL

The first degree program offered at a degree level at which the institution does not already offer degrees (Associate's, Bachelor's, Master's, Professional Doctorate, Research Doctorate) is considered to be a structural change and therefore requires Committee and Commission approval. Joint degree programs are subject to structural change review if the degree level offered is new for one of the institutions.

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

Change of Ownership or Control
When an unaccredited institution merges with a WASC-accredited institution, accreditation is not automatically assumed. Institutions are strongly encouraged to consult with their WASC staff liaison to discuss the process and timeline of a change of this nature.

In accordance with the WASC Policy on Institutions with Related Entities, all substantive changes for a change in ownership involving a ***related entity***[1] 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 planned or anticipated for one-year period following the substantive change application if these initiatives could materially affect the mission, plans and/or operations of the institution (such as restructuring management, increasing enrollment, or adding several new programs). If such anticipated changes would constitute substantive changes (such as change of mission or addition of new locations or online programs), 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 in the Document Library on the WASC website.

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[1] Institutions are consider 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.

The Commission will protect the confidential nature of all information submitted by institutions or by related entities, except as otherwise required by law.

WASC Classifications for Institutional Types
Private postsecondary institutions are generally categorized as public; private non-profit; or for-profit institutions.

Non-profit institutions have traditionally been formed as non-profit corporations under the applicable state's corporation laws. For-profit institutions, on the other hand, have traditionally been formed as for-profit corporations. Recently, with the addition of the limited liability laws, educational entities are being formed as limited liability companies or LLCs. An institution that is formed as an LLC will ordinarily be classified as a for-profit.

However, under certain very limited circumstances, a California LLC may be classified by WASC as a non-profit entity. The criteria for such classification are as follows: (1) all of the member/owners of the LLC must have 501(c)(3) status from the IRS or 23701d status from the California Franchise Tax Board; (2) the Articles of Organization must (a) prohibit the sale and transfer of any ownership interest to any entity that does not have 501(c)(3) or 23701d tax exempt status and to any individual, and (b) include a charitable dedication clause and dissolution clause, consistent with those required from 501(c)(3) and 23701d organizations; (3) the institution must have approval from the State Board of Equalization for an exemption from property taxes; and (4) the institution must agree (a) not to sell its assets to or merge into any organization that is not a 501(c)(3) or 23701d organization without the approval of the California Attorney General, and (b), before the institution makes any changes that affect its continuing to meet any of these criteria, to seek approval from WASC.

Non-Compliance with Substantive Change Policies

Institutions are responsible for developing internal procedures to assure that they are 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 the institution's WASC staff liaison or the Substantive Change 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 is referred to the Commission to consider a sanction for the entire institution for violation if its responsibilities under Standard One, Institutional Integrity (CFR 1.9). In addition, the president of the institution is notified and the institution is required to submit a response with the following information, in addition to the relevant substantive change proposal(s), 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 reviews this information, the matter is forwarded to the Commission to determine if a sanction is should be imposed.

SECTION II: Substantive Change Review Procedures

This section provides detailed information on the substantive change proposal development and review process. Institutions may also refer to the process flow diagram on the next page that graphically illustrates the steps involved, from the initial submission of an application to the final action on a proposal.

Step 1: Determine Whether a Change is Considered Substantive

To determine whether a change is considered substantive, an institution should first refer to Section I: Substantive Change Policies. This section lists the categories and definitions of substantive changes requiring approval before implementation. Determining the type of change is very important, as it is the basis for how an institution will navigate the substantive change process. Institutions are also encouraged to contact their WASC staff liaison and/or the Substantive Change staff for guidance.

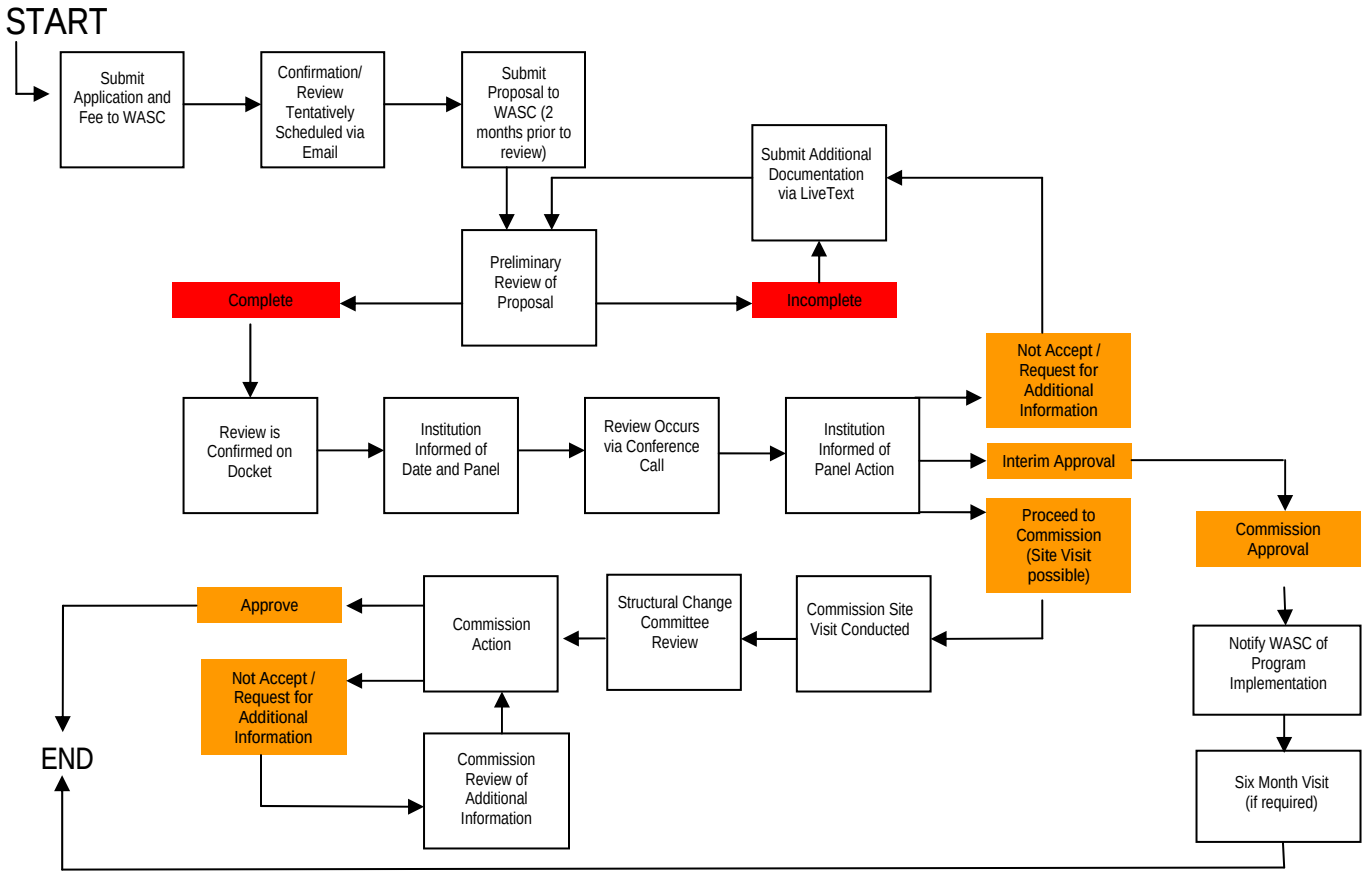
Step 2: Submit Application and Fee at Least Nine Months Prior to the Anticipated Start Date

Once a proposed change is determined to require approval, the Accreditation Liaison Officer (ALO) should submit a Substantive Change Application form and related fee (found in the Document Library on the WASC Senior website). The application must be signed by the institution's ALO to ensure that the proposed change is supported by the institution and should be filed with WASC at least six months prior to the anticipated review date.

Reviews are scheduled on a first-come, first-served basis. Receipt of the application and fee will reserve a place on the Substantive Change Committee's review calendar, which frequently fills up six months in advance. Applications will not be processed until payment is received. The Committee will consider no more than two proposals per month from an institution.

Review Time Frame
It is important to consider the full time frame for the review process. Please note that the proposed change must receive full approval from the Commission before an institution may implement the change. This approval usually occurs within one month of an Interim Approval recommendation of the Substantive Change Committee. This time frame may vary, however, based on the complexity of the proposed change. Structural changes, and those requiring site visits, take longer to complete. Refer to the timeline provided on page 22.

Substantive Change Process Flow Diagram



Step 3: Develop the Proposal

After submitting the application form and review fee, the ALO will receive an email confirmation from the Substantive Change staff. This email will contain important information including:

- The steps involved in developing and submitting the proposal.
- The specific template to complete for the type of change being proposed.
- A user's guide to LiveText, the online submission tool.
- A preliminary review checklist.
- The proposal due date (typically two months prior to the Committee review date).
- The tentative date of the Substantive Change Committee review.

The ALO is responsible for disseminating this information to the institutional representatives drafting the proposal and for reviewing the proposal for completeness and accuracy prior to submission to WASC.

Several templates have been developed to correspond specifically to each type of substantive change. You will be informed of the template that you are to use to complete the proposal. Please follow the instructions in the user guide and respond to each element within the template. Proposals should be no longer than 10,000 words, not including attachments. Appendices should be attached to the appropriate section of the template.

Proposals that the Committee has found to be of high quality are:

- Clearly written and responsive to each element
- Linked to institutional mission and objectives
- Supported by data and evidence, e.g., market analysis
- Show alignment between program and course learning outcomes
- Based on planning processes that include key academic faculty, staff, and administration
- Illustrative of the financial capacity of the institution to sustain the program, i.e., have complete and detailed budgets.

See the Top 10 Reasons Substantive Change Proposals Are Not Approved for more information on how to avoid common errors in proposals.

Internal Review

Before submitting the proposal to WASC, the ALO should conduct a thorough review of the entire proposal using the Preliminary Review Checklist provided by WASC to ensure that all required elements of the assigned template have been completed, to check for spelling and grammatical errors, and to ensure consistency in formatting.

All proposals must also go through the appropriate internal institutional approval process. Prior to submission, proposals must have been approved by all relevant internal entities, such as the chief academic officer, curriculum committee, faculty senate, president or chancellor, board, and/or system office, in keeping with the institution's quality assurance processes. The institution must also demonstrate that the faculty has been appropriately involved in developing and approving the program, especially those involved in its delivery.

Joint Degree Programs
In the case of a joint degree programs, all participating institutions are expected to have approved the proposal prior to submission.

Step 4: Submit the Proposal

The proposal must be submitted via LiveText **60 days in advance of the calendared review date** with the Substantive Change Committee. Proposals submitted after the due date may be rescheduled to another month. A cancellation or rescheduling fee will be applied when an institution requests to reschedule a confirmed review less than three weeks prior to the review date. (Refer to the Schedule of Dues and Fees in the Document Library on the WASC Senior website for the amount of the cancellation fee.)

Preliminary Review by WASC Staff
Once the proposal is submitted, WASC staff will review the proposal and provide the institution with the opportunity to provide missing or incomplete information and documents and to clarify any aspects of the proposal that are not clear. WASC staff will send the ALO an email with instructions for submitting additional information. The institution will be given one week to revise the proposal. Upon receipt of the revisions, the proposal will be forwarded to the Committee panel for review.

Please note that the Substantive Change Committee reserves the right to remove any proposal from its docket if staff determines, after conducting a preliminary review of the proposal, that it is too incomplete or missing elements required by the template. The preliminary staff review is designed to assist the institution in avoiding a Not Accept action by the Committee.

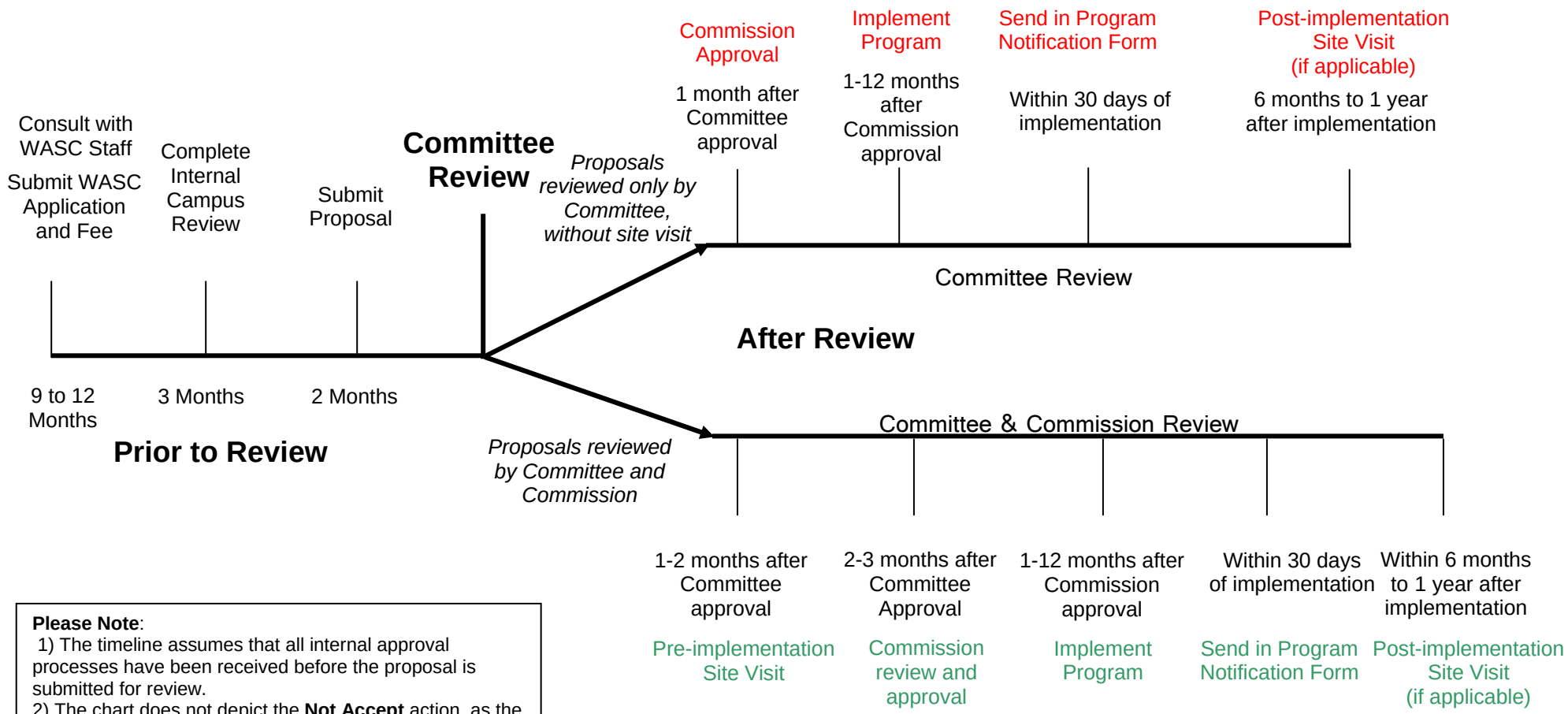
Table 2: Timeline for Marketing and Implementing New Programs

An institution planning to implement a new degree program or site may:

Before Interim Approval (After application and fee are received by WASC.)
Advertise a new degree program or site, with notice “pending WASC approval.”
Receive applications for a new degree program—but not make admit decisions—with notice “pending WASC approval.”
After Interim Approval
Advertise the program or site, with notice “pending WASC approval.”
Receive applications from students
Admit and enroll students, with notice “pending WASC approval.”
After Final Approval from the Commission
Begin offering courses

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 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 documentation or changes.

Step 5: Participate in a Conference Call on the Scheduled Review Date

WASC staff will send the ALO an email confirming the date and time of the review and the dial-in information at least one month prior to the call. The ALO should distribute this information to all institutional representatives participating in the call and will be asked to submit the names and titles of those individuals who will participate in the conference call.

All substantive change proposals are reviewed by a two- or three-person panel drawn from the Substantive Change Committee. Panel members are chosen based on their expertise in the subject matter of the proposal. The panel reviews and assesses each proposal using a scoring rubric, which is compiled and sent to the other panelists prior to the conference call. The panel uses these preliminary evaluations to guide them in their discussions with the institution during the conference call

Each proposal is assigned to a "first reader" on the Committee panel. This individual facilitates the discussion and is responsible for identifying with the panel what, if any, major issues need to be addressed with the institutional representatives. Generally, all panel members ask questions about the proposal during the call. 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 proposal in detail. The Committee panels often ask questions about:

- the planning and approval process
- involvement of key faculty
- support for, and training in, the use of technology (especially for online programs)
- impact upon the broader institution
- learning outcomes, assessment plans and program review
- financial viability
- faculty staffing

Panels also sometimes ask what an institution has learned from previous or similar programs that have been approved and implemented.

Although the proposal should include this information, discussing the proposal with the Committee panel presents an opportunity for the institution to provide additional analysis and interpretation. The Committee is particularly interested in the institution's capacity to sustain the quality of the program, site or organization, including plans to assess student learning outcomes.

During the Call

On the scheduled date of the review, institutional representatives will participate in a 30- to 40-minute discussion by conference call with the panel and the WASC staff liaison.

The Committee has found it particularly helpful to speak with a small institutional team that represents various levels of institutional responsibility for the proposed change. This group should include the ALO and a representative from the provost's or dean's office, the program director, and a key faculty member. Institutions may include up to five representatives.

Step 6: Receive Notification from the Committee

Typically, the WASC staff liaison will inform the ALO of the Committee's action within 24 hours of the call. The panel will take one of the follow actions:

1. Interim Approval and refer to Commission for final approval
2. Proceed to Site Visit (if applicable)
3. Not Accept

Within ten business days, the WASC staff liaison will prepare a formal action report or letter on behalf of the Committee and the staff will send this document to the ALO, with a copy to the president or chief executive officer. This document will set forth requests, if any, and recommendations that arose from the panel's review. The institution is responsible for addressing any requests for additional information or conducting any other follow-up requested.

Step 7: Address Requests by the Committee as Noted in the Formal Action Letter or Report

Table 3 on page 30 provides an overview of the possible Committee actions, as well as institutional and WASC follow-through associated with each action.

If the proposal is approved, the panel will specify commendations and recommendations concerning the proposed change, which should be addressed by the institution, usually at the time of its next site visit. If the proposal is not approved, the panel will specify the reasons that it was not approved, citing to the relevant Criteria for Review in the Standards of Accreditation, and will provide information on the steps to resubmit the proposal if the institution chooses to do so.

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

Commission Approval
In all cases, final approval must be granted by the Commission before implementation of any substantive change can begin. The Commission meets monthly, either in person or by conference call, to take final action on Substantive Change proposals.

Appeal of Committee Decisions

If an institution's proposal is not accepted by a panel of the Committee, the institution may resubmit the proposal, addressing the issues that were identified by the panel as having resulted in the Not Accept action.

The institution may also choose to 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 proposal will review the request and make a decision within 30 days of the date of the request. 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 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.

Step 8. Revise the Proposal (if applicable)

If a proposal is not accepted by the Committee (or the Commission), the institution may revise its proposal, providing additional information and documents to supplement areas that were not fully developed in the proposal or making necessary changes in the planned program to address issues noted in the Substantive Change Committee action letter.

Revised proposals are submitted through LiveText and should be no more than 5,000 words in length, not including attachments.

Revised proposals are reviewed by WASC staff in view of the panel’s action letter to ensure that all information requested has been provided and all issues have been addressed. One or more members of the panel that reviewed the proposal will review and act on the resubmission in collaboration with the assigned WASC staff member. A conference call with the institution may be requested.

Additional information and documents commonly requested when proposals are not approved relate to the following areas:

- Financial resources and budget projections
- Educational effectiveness, including student learning outcomes, assessment plans, and program review
- Curriculum including sequencing
- Faculty and staffing
- Memorandum of Understanding (the final signed copy is required)

The institution must pay a resubmission fee. Please consult the Document Library on the WASC Senior website for the current Schedule of Dues and Fees.

Step 9. Notify WASC of Implementation

Under Standard One, the institution is responsible for notifying WASC within 30 days of the implementation of a substantive change using the appropriate Implementation Form found in the Document Library on the WASC Senior website. Failure to notify WASC of the date of implementation 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 program. Repeated non-compliance with this requirement could also lead to a sanction of the entire institution under Standard One, CFR 1.9.

If the substantive change approved is for an off-campus and/or international site, the Program Implementation form is also used to trigger the scheduling of the six-month site visit. Please refer to Section IV: Substantive Change Site Visits, which describes site visit requirements and process in detail.

Institutions typically have two years from the date of Commission approval to implement the change. This time frame may be shorter for some structural changes, such as a change of ownership. If the change will be implemented more than two years after approval, contact your WASC staff liaison to discuss whether or not the change will need to be re-approved.

SECTION III: Structural Change Review Procedures

Certain categories of substantive change must be reviewed by the Structural Change Committee of the Commission prior to receiving final approval by the Commission. These include changes typically associated with additions of programs at a new degree level or organizational changes. Please refer to the chart in Section I: Substantive Change Policies that lists all substantive change types and indicates whether Commission review is required.

In such cases, the Substantive Change Committee receives and reviews the proposal, interacting with institutional representatives as with other kinds of substantive changes; conducts a site visit; and makes a recommendation to the Structural Change Committee of the Commission. A panel of the Structural Change Committee then reviews the proposal, the site visit report, and the Committee's recommendation, and takes action.

For planning purposes, it is important to anticipate whether or not a substantive change proposal will need to go to the Commission for review, as the process takes at least two months longer to complete than a substantive change requiring only committee review. The Commission must approve all substantive changes. It usually approves recommendations of the Structural Change Committee within two weeks after they are made. After full Commission approval, an institution may begin enrollments, and classes may commence.

As with other substantive changes, prior to Structural Change review and Commission approval, 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 Committee has acted favorably on the proposal and that decision awaits approval by the full Commission.

Please note that institutional representatives do not normally participate in conference call or in-person meetings of the panel of the Structural Change Committee that reviews the proposal.

The Structural Change review process follows the same steps as the Committee Review process described in detail in Steps 1 through 5 in Section II. Please see Steps 6 through 8 below, which outline the additional steps required for a structural change.

Step 6: Receive Notification from the Substantive Change Committee

Within five business days of the call, the WASC staff liaison will inform the ALO of the Committee's action. The panel will take one of the follow actions:

1. Proceed to Site Visit (if required for this kind of proposal)
2. Refer to Commission (site visit waived)
3. Not Accept

Within ten business days, the WASC staff liaison will prepare a formal action letter on behalf of the Committee. The staff will send this letter to the ALO, with a copy to the president or chief executive officer.

If a site visit is required, the ALO will also receive an email outlining the visit process. For more information, see Pre-Implementation Site Visits in Section IV.

In some instances, the pre-implementation site visit may be waived. The proposal will then be forwarded to the Structural Change Committee for review. This process is described in Step 7 below.

When Does the Committee Not Recommend Commission Review?
In some instances, the Substantive Change Committee may determine that a structural change 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 cases, an institution will be notified by its WASC staff liaison and the following may be requested:

- An additional report or evidentiary materials;
- Another Committee review; and/or
- An additional conversation with the institutional representatives.

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

The institution is responsible for addressing any requests for additional information or conducting any other follow-up requested. See Section II: Step 8 above for information on resubmitting a proposal.

Step 7: Receive Final Notification from the Commission

Upon review and approval by the Structural Change Committee, the proposal will be forwarded to the Commission for final approval. An action letter from the Commission will be sent to the ALO notifying the institution of the Commission's decision.

Step 8: Notify WASC of Implementation

Under Standard One, the institution is responsible for notifying WASC within 30 days of the implementation of a substantive change using the appropriate Implementation Form found in the Document Library on the WASC Senior website. Failure to notify WASC of the date of implementation 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 program. Repeated non-compliance with this requirement could also lead to a sanction of the entire institution under Standard One, CFR 1.9.

If the substantive change approved is for an off-campus and/or international site, the Program Implementation form is also used to trigger the scheduling of the six-month site visit. Please refer to Section IV: Substantive Change Site Visits, which describes site visit requirements and process in detail.

Table 3: Substantive Change Committee Actions and Next Steps

COMMITTEE ACTION	INSTITUTION ACTION	WASC STAFF ACTION
Interim Approval In order to comply with federal regulations, all substantive change proposals must be approved by the Commission. The Substantive Change Committee grants interim approval and final approval is granted by the Commission at its monthly action meeting.	**Prior to Commission Approval:** An institution may enroll students, who may be eligible for financial aid, while the Committee's decision awaits approval by the Commission. An institution may not begin classes until Commission approval is received. **After Commission Approval:** The institution must notify WASC that the proposed program has been started via submission of Implementation Form within 30 days of implementation If post-implementation site visit is required, the institution works with Substantive Change staff to schedule visit within specified time frame.	**Prior to Commission Approval:** Schedule proposal for approval by the Commission at its next action meeting. **Prior to Commission Approval:** The staff notifies institution of Commission's action following the meeting. If post-implementation site visit is required, the staff works with institution to schedule visit within specified timeframe.
Not Accept	Submit additional information as requested by the committee in a revised resubmission with required fee.	Receives and reviews the proposal and fee and schedules a resubmission review for the proposal.
Proceed to Site Visit (Refer to Commission)	**Prior to the Visit:** ALO works with Substantive Change staff to plan and schedule the visit. **After the Visit:** After the visit, institution reviews the report of the visiting team for correction of errors (refer to Section IV for more information). After forwarding response, institution awaits notification of decision of Commission review. ALO notifies WASC of start of change via submission of Implementation Form within 30 days of the date of implementation.	**Prior to the Visit:** Substantive Change staff works with ALO to plan and schedule visit. **After the Visit:** After the visit, proposal is scheduled for review by a panel of the Structural Change Committee of the Commission. Notification of the panel's decision is communicated to the institution by Action Letter following approval. If post-implementation site visit is required, work with institution to complete within specified time frame.
Refer to Commission (No Site Visit Required) Action taken if a proposal requires Commission review, but a site visit is not required.	Institution awaits notification of decision of Commission review. ALO submits implementation form within 30 days of implementation	Proposal is scheduled for review by a panel Structural Change Committee of the Commission. Notification of the panel's decision is communicated to the institution by Action Letter following approval. If post-site visit is required, work with institution and Substantive Change committee to complete within six months of implementation.

SECTION IV: Substantive Change Site Visits

Site visits are required for certain types of substantive changes, based on U.S. Department of Education and WASC policy. This section outlines the two types of required Substantive Change site visits: pre-implementation visits and post-implementation visits.

Pre-implementation Site Visit

Pre-implementation site visits are required for most structural changes, including:

- First degree at a new degree level
- Joint doctoral degree program
- Change in mission, legal status or form of ownership or control

These visits occur after a proposal has been reviewed by the Substantive Change Committee and must be completed before a proposal can receive Interim Approval and be forwarded to the Structural Change Committee for review.

Purpose and Scope of the Visit
The primary purpose of a pre-implementation site visit is to assess how a proposed structural change will be implemented, to answer questions identified by the Substantive Change Committee, and to determine the overall impact of the change on the institution. One or two members of the Substantive Change panel that reviewed the proposal will conduct the visit over one or two days.

Substantive change site visits are typically narrow in scope. The issues to be explored during the visit are determined in advance, and are outlined in the action letter or report received by the institution prior to the visit. During the visit, the reviewers may:

- Meet with institutional representatives, faculty, students, and third-party providers
- Observe teaching and learning spaces
- Learn more about the curriculum and assessment plans
- Evaluate the financial and administrative capacity to offer the program
- Seek additional information or perspectives.

The visit typically occurs within 30 to 60 days following the Substantive Change Committee review. In some cases, the site visit may include branch campuses and/or regional centers that provide administrative support or oversight to the site.

Following the visit, the team will write a brief report, which will be forwarded to the institution for correction of errors of fact. The report will include a recommendation to either a) forward the proposal and all related materials to the Commission for review; or b) not accept the proposal.

Please refer to the Structural Change Site Visit Guidelines found in the Document Library on the WASC Senior website.

Pre-implementation site visits may be waived at the discretion of WASC staff or the Substantive Change Committee.

Visit Expenses
Evaluator expenses and the applicable site visit fee will be charged to the institution. Please refer to the Document Library on the WASC Senior website for the current Schedule of Dues and Fees.

Post-implementation Site Visit

Substantive changes that may require post-implementation visits include:

- Off-campus sites (within six months of implementation) 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.

- International programs (six months to one year after implementation). Site visits must be conducted within:
  - Six months, if students enrolled in the program are eligible for, and will seek, U.S. federally funded financial aid.
  - One year, if a) the site is the first location in a country; and b) students enrolled in the program are not eligible for, and will not seek U.S. federally funded financial aid. (Please note that WASC policy requires a site visit within one year to the first site in a new country. These visits may be waived for certain types of international programs at the discretion of the Substantive Change Committee.)

- Change in mission, legal status, or control (within six months of implementation)

- Visit requested by the Committee or Commission staff for extenuating circumstances.

Purpose and Scope of the Visit
The Committee action letter or report approving the proposal will note that a site visit is required within a specified time period after the implementation of the change and will outline the issues to be evaluated during the visit. The institution is responsible for informing WASC that a change of ownership has been completed or that a program at an approved site or off-campus location has been started using the appropriate Implementation Form. WASC staff will then contact the ALO to plan and schedule the site visit.

In some cases, the visit may be included as part of the institution's comprehensive review (Capacity and Preparatory Review or Educational Effectiveness Review) of the visit is already scheduled to occur within one year of the start of the program. A post-implementation visit may also be combined with a scheduled Special Visit.

Whenever possible, members of the Substantive Change Committee panel that conducted the review will also conduct the site visit. Visits are typically conducted by one or two reviewers in one day.

Following the visit, the team will write a brief report, which will then be forwarded to the institution for correction of errors of fact. The report will be reviewed by the WASC staff liaison and forwarded to the institution. If the visit raises questions about compliance with WASC Standards or policies, it will be forwarded to the Commission for further action.

Please refer to the Follow-Up Site Visit Guidelines and Checklist and the Off-Campus Site Summary in the Document Library on the WASC Senior website for more information on the structure and content of these visits.

Visit Expenses

Evaluator expenses and a site visit fee will be charged to the institution. Please refer to the Document Library on the WASC Senior website for the current Schedule of Dues and Fees.

Appendix 1: 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 or program(s) 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.
- The establishment of a new degree program in which more than 25% of the program will be **delivered under contract** with an institution or organization not certified to participate in Title IV, HEA programs.

Additionally, federal regulations require regional accreditation substantive change policies to address: 1) distance education; 2) correspondence education; 3) branch campuses; and 4) site visits related to substantive changes.

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.

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.

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.

Appendix 2: Additional Resources

The following resources may be found in the Document Library on the WASC Senior website, www.wascsenior.org. Once in the Document Library, click on "Browse by Category" and choose "Substantive Change" from the pull-down menu.

WASC Policies

Contracts with Unaccredited Organizations
Degree-Level Approval Policy
Handbook of Accreditation
Instruction in Languages Other than English
Inter-Regional Accreditation
Policy on Institutions with Related Entities
Policy on Teach-out Plans and Agreements
Schedule of Dues and Fees

Proposal Development Resources

Best Practice Strategies to Promote Academic Integrity in Online Education
Guide to Submitting a Substantive Change Proposal
Guidelines for the Evaluation of Distance Education
LiveText Proposal Templates and Scoring Rubrics
Preliminary Review Checklist
Principles of Good Practice in Overseas International Education Programs
Substantive Change Sample Proposals: samples.wascsenior.org
Top 10 Reasons Substantive Change Proposals are Not Approved

Site Visit Resources

Follow-up Site Visit Guidelines and Checklist
Protocol for the Review of Distance and Correspondence Education Programs
Protocol for the Review of Locations Geographically Apart from the Main Campus
Structural Change Site Visit Guidelines

Forms

Change of Address for Off-campus Locations
Fast Track Modality Change Application
Implementation Form (Change of Ownership or Control)
Program Implementation Form (New Programs or Off-campus Sites)
Substantive Change Application

For more information, please visit http://wascsenior.org/resources/subchange.