Substantive Change Compliance Policy

1. Purpose
Fisk University recognizes the importance of compliance with the Southern Association of Colleges and Schools' Substantive Change for Accredited Institutions of the Commission on Colleges Policy Statement (SACSCOC, Dec. 2011 and revised Dec. 2013), which requires Fisk to report all substantive changes accurately and in a timely manner to the Commission on Colleges. The purpose of this Fisk policy is to describe the process and procedures to be utilized to ensure that Fisk complies with this SACSCOC policy. As a standard of accreditation the University must notify SACSCOC of substantive changes before they occur. The SACS accreditation liaison is then responsible for notifying SACSCOC of the change as provided in the latest version of the SACSCOC substantive change policy. Vice Presidents should conduct an annual review of their internal operating procedures to ensure reporting of future substantive change proposals. The vice presidents, deans and department chairs should recognize that if the university fails to follow the latest version of the SACSCOC substantive change policy and procedures, it may lose its Title IV funding, be prohibited from receiving federal contracts and grants or be required by the U.S. Department of Education to reimburse it for money received by the institution for programs related to the unreported substantive change. In addition, the institution's case may be referred to SACSCOC Board of Trustees for the imposition of a sanction or for removal from membership.

2. Scope
The Fisk University Substantive Change Compliance Policy applies to each academic unit and department within Fisk and is mandatory. Within academic areas, such changes can originate with (1) individual or groups of faculty members, (2) department committees, (3) Department Chairs, (4) Deans, (5) Provost and Vice President for Academic Affairs, (6) Faculty Assembly, or (7) any other area reporting to the Provost.

In those areas outside the Division of Academic Affairs, potential substantive changes may arise in (1) individual units, (2) among supervisors in each area, (3) executive management teams within Vice Presidential or Executive Director areas, or (5) with the Vice Presidents/Executive Directors themselves. Further, the need for a potential substantive change may come to the attention of the President or those in his direct reporting line.

3. Definition
Substantive change is a significant modification or expansion in the nature and scope of an accredited institution. The SACSCOC policy on substantive change incorporates federal requirements into its substantive change policy and procedures. (34 CFR 602.22) The types of substantive change and the procedures for addressing them appropriately may be found in the Commission’s policy on substantive change and its substantive changes website. Substantive change is a federal term for any “significant modification of the nature and scope of an accredited institution.” Fisk University’s regional accrediting agency, the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), is required by the federal government to monitor compliance with the substantive change policy and to approve any major changes.

Substantive change as defined by the Commission on Colleges is "a significant modification or expansion of the nature and scope of an accredited institution." Under federal regulations

1. A substantive change includes:
   • Any change in the established mission or objectives of the institution
   • Any change in legal status, form of control, or ownership of the institution
   • The addition of courses or programs that represent a significant departure, either in content or method of delivery, from those that were offered when the institution was last evaluated
   • The addition of courses or programs of study at a degree or credential level different from that which is included in the institution's current accreditation or reaffirmation.
   • 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 branch campus
   • Closing a program, off-campus site, branch campus or institution
   • Entering into a collaborative academic arrangement that includes only the initiation of a dual or joint academic program with another institution
   • Acquiring another institution or a program or location of another institution
   • Adding a permanent location at a site where the institution is conducting a teach-out program for a closed institution
   • Entering into a contract by which an entity not eligible for Title IV funding offers 25% or more of one or more of the accredited institution's programs

2. There are three procedures established by SACSCOC that enable universities to comply with federal law regarding a substantive change. They are:
   • Procedure One - SACSCOC procedure associated with a substantive change that requires SACSCOC notification and approval prior to implementation. Changes under Procedure One require notification, a prospectus or application, and may involve an on-site visit.
   • Procedure Two - SACSCOC procedure associated with a substantive change that requires only SACSCOC notification prior to implementation.
   • Procedure Three - SACSCOC procedure associated with Closing a Program, Instructional Site, Branch Campus or an Institution.
4. Policy
The process that Fisk University will use to ensure compliance with the “Substantive Change for Accredited Institutions of the Commission on Colleges Policy Statement” involves the following four methods: 1) implementing effective communication and procedures, 2) providing adequate resources, 3) conducting periodic training, and 4) utilizing quality assurance safeguards.

5. Communication and Procedures
- At the earliest stage of consideration, any proposed change that could be deemed substantive according to the latest revision of SACSCOC policy must be submitted in writing to the Provost or appropriate Vice President, as outlined above in Section C. This notification must include:
  (a) Title of the proposed change;
  (b) A brief description of the change including its potential impact on students, faculty, location, scope and means of instruction;
  (c) The name and position of the responsible individual will act as contact;
  (d) A tentative timeline for approval; and
  (e) The earliest date possible for implementation.
- Detailed procedures regarding all academic program planning and revision processes are found in Fisk’s Faculty Handbook, Section E on “POLICY ON ADDING, DROPPING, OR SUBSTITUTING COURSES OF INSTRUCTION”, pages 19-20
- Academic units follow the procedures within the faculty Handbook to obtain internal approval for substantive changes.
- The Substantive Change Survey is sent to Office of Institutional Effectiveness, jcurry@fisk.edu to identify timing and reporting requirements early in the planning process.
- After a review of the responses to the survey, if it is unclear as to whether a change is substantive in nature, the Fisk SACS Accreditation Liaison contacts SACSCOC staff for consultation.
- Internally approved substantive change actions are sent to the Office of Provost and to the Office of Institutional Effectiveness for external processing.
- Approved actions are processed, documented, and tracked for each required compliance step for each external authority.
- Actions and decisions are communicated to appropriate deans and stakeholders
- When all internal reviews and approvals have been obtained, the SACSCOC Liaison will send SACSCOC a written notification of the proposed change. Depending on the type of change and subsequent instructions from SACSCOC, the University may be required to submit a Substantive Change Prospectus and/or an Application for approval, within a minimum of three months and up to as many as 12 months prior to implementation of the change (per Appendix I). The decision to close an educational program, instructional site or branch campus shall be accordance with university Teach-Out Policy, see APPENDIX B.

6. Resources
The Fisk University SACS Accreditation Liaison provides guidance for all external reporting activities. The Dean of the School of Humanities and Social Sciences, the Dean of the School of Natural Sciences, Mathematics and Business and the Dean of the School of Graduate Studies provide guidance for internal procedures.

7. Training
The Office of Institutional Effectiveness will offer periodic training for liaisons on substantive change policy and other academic program compliance issues. Each academic dean will appoint a substantive change liaison. Each substantive change liaison will monitor the activity of their school for substantive change issues and train its departments on external reporting requirements to ensure compliance with this policy.

8. Quality Assurance
The Office of Institutional Effectiveness maintains and monitors an external reporting tracking system. Procedures and information contained in the Faculty Handbook are reviewed and published annually. The Education and Research Committee of the Fisk Faculty Assembly is responsible for monitoring the various stages of academic program processes. This committee meets monthly to discuss issues regarding academic programs, to identify upcoming challenges, and to find solutions to problems and thereby supports effective compliance maintenance. The University Registrar will implement changes upon receiving the official SACSCOC letters from the Office of Institutional Effectiveness and will provide the means to track off-campus activity. Metrics are kept and reported annually regarding timely reporting of substantive change activity.

9. Enforcement
Responsibility for enforcement of this policy resides with the President. The Deans are responsible for their units adhering to the procedures set forth within the Faculty Handbook, and the Provost is responsible for ensuring that they do. The Provost serves as the liaison to the Southern Association of Colleges and Schools Commission on Colleges with responsibility to report substantive changes in a timely manner. No substantive change can be implemented until a letter of approval or an acceptance of notification is received from the Commission on Colleges. Prior to receipt of the letter of approval, any distribution of information, including advertising, must include wording that the program is pending SACSCOC approval.

10. Review
The Faculty Assembly, Provost’s Council, and the Provost have reviewed and the President has approved The Fisk University Substantive Change Compliance Policy. This policy will be reviewed and updated periodically as appropriate.

12. Contact
Comments or questions? Contact the Office of the Provost at (615) 329-8500.
APPENDIX A - Substantive Change Survey

The university must notify its accrediting body of any potential substantive change before the change is implemented. A substantive change is "a significant modification or expansion" and includes offering coursework or programs at a more advanced level, initiating joint degrees, and proposing programs/courses through a contract agreement or consortium.

Please complete the survey* below to determine whether the change you are proposing is a substantive change.

1) Name of Person Responsible

2) Will coursework or programs be offered at a more advanced level than currently approved?
   • ☐ Yes
   • ☐ No

   Please provide details:

3) Will the initiative expand programs at the current degree level? For example, offering a new master's or doctoral degree in an area significantly different to existing programs
   • ☐ Yes
   • ☐ No

   Please provide details:
4) Are a number of new faculty required?
   - ○ Yes
   - ○ No

   Please provide details:

5) Are a number of new courses required?
   - ○ Yes
   - ○ No

   Please provide details:

6) Are distance learning courses offered?
   - ○ Yes
   - ○ No

   Please provide details:

7) Will the program be offered at an off-campus or foreign site?
   - ○ Yes
   - ○ No

   Please provide details:

8) Will the program/courses be offered through a contractual agreement, institutional collaboration, or consortium?
   - ○ Yes
   - ○ No

   Please provide details:

9) Will the length of a program be significantly altered?
   - ○ Yes
10) Will the initiative be a degree completion program?

(Degree completion programs are accelerated programs in areas such as management and leadership. Degree completion programs usually include a compressed format with classes offered evenings or weekends to accommodate working adults, a requirement to transfer in some amount of previous college credit, and may include offering credit for career or life experience.)

- ☐ No
- ☑ Yes
- ☐ No

Please provide details:

11) Will a program be closed?

- ☐ Yes
- ☐ No

Please provide details:

12) Please return this complete survey to the Office of the Executive Vice President and Provost
APPENDIX B - POLICY ON ADDING, DROPPING, OR SUBSTITUTING COURSES OF INSTRUCTION

*from the FACULTY HANDBOOK, Approved by the Faculty Assembly, September 4, 2008, pages 19-20

All course offerings, degree requirements, curricula and new programs, must meet the University’s requirements regarding the mission of the institution; discipline courses must fit within the limitations on courses offered by each department. The order of approval for adding, dropping, or substituting courses of instruction at the University is as follows:

1. Department in which the addition, deletion, or substitution is to be made
2. Division in which the above department is housed (or special committee designated by the division)
3. Faculty Assembly Committee on Education and Research
4. Faculty Assembly
5. Provost

The author of the proposed change should be invited to appear before the persons considering the proposal to answer any pertinent questions. The sponsoring department or division should also prepare and submit to the Education and Research Committee a defense of the change based on the following outline:

a. Course title, catalog description, credit hours

b. Is this a substitution, addition, or deletion?

c. Anticipated scheduling:
   i. How often will the course be offered?
   ii. What is the proposed weekly schedule?

d. Rationale for the proposed change
   i. Course goals and objectives
   ii. How will the change affect the existing curriculum?
   iii. Are similar courses offered that the University?
   iv. Is this a required course?
   v. Does this change the profile of major requirements for the relevant discipline?

e. Resources needed
   i. What new library, laboratory, or support resources are necessary?
   ii. What will be the effect of this change on staffing and costs?