

## Substantive Change Policy and Procedures

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, revised Dec. 2013, Dec. 2020, and June 2021), 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 (4) with the Vice Presidents/Executive Directors, (5) Board of Trustees. 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 Substantive changes, including those required by federal regulations, include:

- Substantially changing the established mission or objectives of an institution or its programs.
- Changing the legal status, form of control, or ownership of an institution.
- Changing the governance of an institution.
- Merging / consolidating two or more institutions or entities.
- Acquiring another institution or any program or location of another institution.
- Relocating an institution or an off-campus instructional site of an institution (including a branch campus).
- Offering courses or programs at a higher or lower degree level than currently authorized.
- Adding graduate programs at an institution previously offering only undergraduate programs (including degrees, diplomas, certificates, and other for-credit credential).
- Changing the way an institution measures student progress, whether in clock hours or credit-hours; semesters, trimesters, or quarters; or time-based or non-time-based methods or measures.
- Adding a program that is a significant departure from the existing programs, or method of delivery, from those offered when the institution was last evaluated.
- Initiating programs by distance education or correspondence courses.
- Adding an additional method of delivery to a currently offered program.
- Entering into a cooperative academic arrangement.
- Entering into a written arrangement under 34 C.F.R. § 668.5 under which an institution or organization not certified to participate in the title IV Higher Education Act (HEA) programs offers less than 25% (notification) or 25-50% (approval) of one or more of the accredited institution's educational programs. An agreement offering more than 50% of one or more of an institution's programs is prohibited by federal regulation.
- Substantially increase or decreasing the number of clock hours or credit hours awarded or competencies demonstrated, or an increase in the level of credential awarded, for successful completion of one or more programs.
- Adding competency-based education programs.
- Adding each competency-based education program by direct assessment.
- Adding programs with completion pathways that recognize and accommodate a student's prior or existing knowledge or competency.
- Awarding dual or joint academic awards.
- Re-opening a previously closed program or off-campus instructional site.

- Adding a new off-campus instructional site/additional location including a branch campus.
- Adding a permanent location at a site at which an institution is conducting a teach-out program for students of another institution that has ceased operating before all students have completed their program of study.
- Closing an institution, a program, a method of delivery, an off-campus instructional site, or a program at an off-campus instructional site.

#### **4. Policy**

- The process that Fisk University will use to ensure compliance with the “*Substantive Change Policy and Procedures*” 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.
- 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 consistent with SACSCOC policy.

## **6. Resources**

The Fisk University President, Provost and SACS Accreditation Liaison provide 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 relative to curriculum revision.

## **7. Training**

The Office of Institutional Effectiveness will offer periodic training for responsible persons on substantive change policy and other academic program compliance issues. Each academic dean will appoint a substantive change liaison (Discipline Coordinators). 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. For changes beyond curriculum revisions, the President and Board of Trustees maintain and monitor those processes using Board of Trustee By-Laws.

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 Provost's Council, and the Provost have reviewed and the President has approved The Fisk University Substantive Change Policy and Procedures. This policy will be reviewed and updated periodically as appropriate.

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## **12. Contact**

Comments or questions? Contact the Office of the Provost at (615) 329-8500.