

Policy 2102 Substantive Change Reporting Requirements

Date of Current Revision: June 2022

Responsible Officer: Provost and Senior Vice President for Academic Affairs

Secondary Responsible Officer: SACSCOC Accreditation Liaison

1. PURPOSE

The purpose of JMU's substantive change policy and procedure is to ensure all substantive changes, as defined within, are reported to the university's accreditation body, the Southern Association of Colleges and School Commission on Colleges (SACSCOC), in a timely fashion as required by the SACSCOC [*Substantive Change Policy and Procedures*](#) document.

The policy defines the requirements, procedures and processes for coordinating the university's timely and complete notification of substantive changes to SACSCOC.

If there are differences between the most current version of the SACSCOC substantive change policy and this policy, JMU must follow the procedures, including submission deadlines, described by SACSCOC.

2. AUTHORITY

The Board of Visitors has been authorized by the Commonwealth of Virginia to govern James Madison University. See Code of Virginia section § 23.1-1600; § 23.1-1301. The board has delegated the authority to manage the university to the president.

STATE OR FEDERAL STATUTE AND/OR REGULATION

SACSCOC accredits the university and its programs and services, wherever they are located or however they are delivered. The SACSCOC is recognized by the United States Department of Education as an agency whose accreditation enables its member institutions to seek eligibility to participate in federally funded programs. SACSCOC requires accredited institutions to follow the substantive change procedures of the association. In order to retain accreditation, the university is required to comply with SACSCOC procedures concerning substantive changes.

This policy is enacted pursuant to the SACSCOC policy [*Substantive Change Policy and Procedures*](#), revised June 2021.

3. DEFINITIONS

Branch Campus

A special form of off-campus instructional site that is geographically apart from an institution's main campus, where instruction is delivered, and is independent of the main campus of an institution. An off-campus instructional site is independent of the main campus if it is permanent; offers courses in educational programs leading to a degree, diploma, certificate, or other for-credit credential; has its own faculty and administrative or supervisory organization; and has its own budgetary and hiring authority.

Educational Program

A coherent course of study leading to the awarding of a credential; i.e., a degree, diploma or certificate.

Implementation Date

The effective date of a substantive change. The intended implementation date cannot pre-date the date the substantive change prospectus or application is submitted. Substantive changes cannot be retroactively approved.

Institutional Changes

As delineated by SACSCOC, substantive institutional changes include:

- Change in Measure of Student Progress to Completion
- Competency-based Education by Course/Credit-based Approach – Institutional-level Approval
- Distance Education – Institutional-level Approval
- Governance Change
- Institution Closure
- Institution Relocation
- Acquisition
- Institutional Contingency Teach-out Plan
- Level Change
- Merger/Consolidation
- Mission Change
- Ownership, Means of Control, or Legal Status Change

Off-campus Instructional Site/Additional Location Changes

As delineated by SACSCOC, substantive off-campus instructional site changes include:

- Off-campus Instructional Site Definitions and Guidelines
- Off-campus Instructional Site Notification
- Off-campus Instructional Site Approval (including branch campus)
- Off-campus Instructional Site Relocation
- Off-campus Instructional Site Name or Address Change
- Off-campus Instructional Site Closure
- Off-campus Instructional Site Re-open

Off-Campus Location

A location that is geographically apart from an institution's sole main campus and where instruction is delivered.

Program Change

As delineated by SACSCOC, substantive program changes include:

- Clock-Credit Hour Conversion
- Competency-based Education by Direct Assessment – Approval or Notification
- Cooperative Academic Arrangements Definitions and Guidelines
- Cooperative Academic Arrangement with Title IV Entities
- Cooperative Academic Arrangement with Non-Title IV Entities – Approval or Notification

- Correspondence Education
- Dual Academic Award
- Joint Academic Award with non-SACSCOC Institution(s) or Entity(ies)
- Joint Academic Award with SACSCOC Institution(s)
- Method of Delivery – Approval or Notification
- New Program – Approval or Notification
- Program Closure
- Program Designed for Prior Learning – Approval or Notification
- Program Length Change
- Program Re-open

SACSCOC Accreditation Liaison

An individual assigned by the university to act as liaison between the university and SACSCOC.

Significant Departure

An educational program that is not closely related to previously approved programs at the institution or site or for the mode of delivery in question. To determine whether a new program is a “significant departure,” SACSCOC suggests considering the following questions:

- What previously approved programs does the institution offer that are closely related to the new program and how are they related?
- Will significant additional equipment or facilities be needed?
- Will significant additional financial resources be needed?
- Will a significant number of new courses be required?
- Will a significant number of new faculty members be required?
- Will significant additional library/learning resources be needed?

Submission Deadline

Date by which a substantive change prospectus, application, and notification must be submitted to SACSCOC. Dates differ based on the required type of SACSCOC review and the intended implementation date of the substantive change.

Substantive Change

A significant modification or expansion of the nature and scope of an accredited institution. Substantive change includes high-impact, high-risk changes and changes that can impact the quality of educational programs and services. There are three types of substantial changes: Institutional changes, Program changes, and Off-campus instructional site changes.

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 credentials).
- 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 decrease the number of clock hours or credit hours awarded or competencies demonstrated, or an increase in the level of credentials 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. APPLICABILITY

This policy applies to all substantive changes as defined herein. It applies to all university officers who initiate, review, approve and/or allocate resources to any substantive changes, including academic and non-academic programs and activities.

This policy applies to all university members whose unit may be involved in a substantive change, regardless of their division or position.

The nature of a change determines whether the substantive process must be followed. Any area with planned activity that may constitute a substantive change must comply with the applicable process before implementation.

5. POLICY

As the university pursues structural and programmatic changes, all of those changes deemed to be “substantive,” as defined herein, must comply with the applicable procedure prior to implementation.

The university will follow the substantive change procedures of SACSCOC and inform SACSCOC of such changes and proposed changes in accord with those procedures.

Regardless of the origination point, all substantive changes must be tracked and reported under this policy.

6. PROCEDURES

6.1 Monitoring for Substantive Changes

- a. Each vice president will designate an individual from their division to serve as the Substantive Change Monitor. This person will work with the Substantive Change Coordinator, a member of JMU’s SACSCOC Working Group, to remain up-to-date on SACSCOC descriptions of possible substantive changes and the general requirements for submission.
- b. The Substantive Change Coordinator will serve as the Substantive Change Monitor for Academic Affairs.
- c. When a Substantive Change Monitor becomes aware of a potential substantive change in their division, the monitor will, in collaboration with their vice president, notify the Substantive Change Coordinator via email with a brief description of the change, including its tentative implementation date.
- d. The Substantive Change Coordinator will record the submitted information in the Substantive Change Tracking Database and begin to coordinate with the Substantive Change Monitor.
- e. The Substantive Change Monitors will undertake annual training arranged by the Substantive Change Coordinator.

6.2 Determining and Documenting Substantive Changes

- a. The Substantive Change Coordinator, in coordination with the SACSCOC Accreditation Liaison, will determine if the proposed change meets the standard of a SACSCOC substantive change.
- b. If the proposed change is determined to not be a substantive change, the Substantive Change Coordinator will prepare a justification for the decision. This justification will be sent to the appropriate vice president and the president and remain on file with other accreditation records. The proposed action will remain subject to all other applicable internal and external review and approval processes.

- c. If the proposed action is determined to be a substantive change, the Substantive Change Coordinator will notify the appropriate vice president and president of the need to prepare submission materials and the required timeline for preparation of materials prior to implementation.
- d. If the SACSCOC Accreditation Liaison and Substantive Change Coordinator are uncertain whether a proposed action is a substantive change, the liaison will communicate with SACSCOC staff or the institution's vice president. Note: Communication with the SACSCOC vice president must originate from the President or SACSCOC accreditation liaison only.

6.3 Preparing Substantive Change Materials for Submission

- a. The Substantive Change Coordinator will oversee preparation of submission materials for SACSCOC, in coordination with the Substantive Change Monitor for the division submitting the change.
- b. The areas involved in the substantive change must provide all required information to Substantive Change Monitor as requested in order to meet the timeline for submission.
- c. The Substantive Change Coordinator will follow the applicable procedure and instructions published online in the SACSCOC Substantive Change Policy and Procedures document to prepare the submission materials.
- d. Throughout the process, the Substantive Change Coordinator will report the progress of the submission to the appropriate vice president and President.

6.4 Submitting Substantive Change Materials to SACSCOC

- a. When submission materials have been prepared, the Substantive Change Coordinator will send them to the president with a request that they be submitted to SACSCOC.
- b. The President will send SACSCOC the appropriate written notification of the proposed substantive change.
- c. The President will send the Substantive Change coordinator confirmation of submission when it is received from SACSCOC.
- d. The Substantive Change Coordinator will update the Substantive Change Tracking Database with confirmation of receipt and any other SACSCOC correspondence received in relation to the substantive change.

7. RESPONSIBILITIES

SACSCOC Accreditation Liaison

The SACSCOC Liaison coordinates with the Substantive Change Coordinator to ensure appropriate review, submission and documentation of substantive changes.

Substantive Change Coordinator

The Substantive Change Coordinator is responsible for ensuring compliance with the

SACSCOC and JMU policies related to substantive change, which includes remaining up-to-date on changes to the SACSCOC policy and ensuring that the institution policy remains accurate. The Substantive Change Coordinator also works with the Substantive Change Monitors to ensure that they have the latest guidelines needed to identify substantive changes in their divisions.

Substantive Change Monitors

Substantive Change Monitors are responsible for monitoring their divisions for potential substantial changes and communicating with the Substantive Change Coordinator as needed. Substantive Change Monitors must remain current on SACSCOC substantive change regulations that may affect their divisions.

Vice Presidents

The vice presidents are responsible for naming a Substantive Change Monitor for their division and for ensuring that those involved in the substantive change process within their areas provide the appropriate materials in a timely fashion.

President

The president, along with the SACSCOC Accreditation Liaison, is responsible for the accuracy of all information submitted to SACSCOC and for ensuring ongoing compliance with SACSCOC standards, policies, and procedures beyond reaffirmation.

All departments, offices and employees that generate, receive or maintain public records under the terms of this policy are also responsible for compliance with Policy [1109](#) - Records Management.

8. SANCTIONS

Sanctions will be commensurate with the severity and/or frequency of the offense and may include termination of employment.

9. EXCLUSIONS

None.

10. INTERPRETATION

The authority to interpret this policy rests with the president and is generally delegated to the Provost and Senior Vice President for Academic Affairs.

Previous version: April 2012

Approved by the president: August 2010