

SUBSTANTIVE CHANGE POLICY (REVISED JUNE 2021)

In accordance with accrediting standards outlined by the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), Benedict College offers the following Substantive Change Policy and procedural guide for approving and reporting significant changes in its mission, infrastructure, and educational activities. These changes, which alter the character of the institution and/or the essential nature of its services, must be duly reviewed for their impact on a broad range of constituencies and reported to the college’s accrediting bodies. As such, all campus units are required to comply with the following guidelines to ensure systematic review, appropriate approvals, and timely reporting prior to the implementation of any substantive change, as defined in this policy.

Failure to notify or to obtain approval, as required by the SACSCOC policy, places the institution in a state of non-compliance and has implications for the college’s accreditation status and ability to dispense Title IV aid. Therefore, it is imperative that the college have strict procedures for identifying substantive changes on campus and ensuring that notification and approval procedures are strictly followed.

SUBSTANTIVE CHANGES - DEFINED

SACSCOC defines a substantive change as “a significant modification or expansion of the nature and scope of an accredited institution” ([SACSCOC Substantive Change Policy and Procedures](#), 2020, p. 2). Changes are explicitly defined by SACSCOC, and include regulatory requirements set by the federal government for Title IV-participating schools.

The SACSCOC policy outlines two broad categories of substantive changes: Institutional Changes and Program Changes. Institutional changes affect the institution’s identity and circumscribe the scope of college services. Program changes affect the delivery and scope of select academic programs. Substantive changes in both categories are explicitly defined in the [SACSCOC Substantive Change Policy and Procedures](#), which also provides information on submission, review, and appeal processes.

Table 1. Substantive Change Categories

Institutional Changes	Program Changes
<ul style="list-style-type: none"> • 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 • Institution, Program, or Location Acquisition • Institutional Contingency Teach-out Plan • Level Change • Merger / Consolidation • Mission Change • Ownership, Means of Control, or Legal Status Change 	<ul style="list-style-type: none"> • Clock-Credit Hour Conversion • Competency-based Education by Direct Assessment • Cooperative Academic Arrangement with Title IV Entities • Cooperative Academic Arrangement with Non-Title IV Entities • Correspondence Education • Dual Academic Award • Joint Academic Award with non-SACSCOC Institution(s) • Joint Academic Award with SACSCOC Institution(s) • Method of Delivery • New Program • Program Closure • Program Designed for Prior Learning • Program Length Change • Program Re-open _

Campus changes that are not explicitly addressed or that are more restricted in scope than the parameters outlined in the SACSCOC Substantive Change Policy are not considered substantive changes and should not be reported to SACSCOC.

NOTIFICATION AND APPROVAL TIMELINES

SACSCOC requires its member institutions to notify the accrediting agency of all substantive changes prior to implementation; in addition, certain categories of change require prior approval by the SACSCOC Board of Trustees or by the SACSCOC Board of Trustees' Executive Council. Therefore, the following internal timelines will be enforced on Benedict's campus to ensure sufficient lead time for submissions to SACSCOC. Unit procedures and timelines should be developed/adjusted in accordance with the timelines stated in Table 2 below.

Sanctions from SACSCOC or the Department of Education place an institution on 'Substantive Change Restriction,' which requires increased scrutiny of certain proposed changes. This status applies if the college is placed on Warning, Probation or Probation for Good Cause by SACSCOC or if it is under provisional certification for participation in federal financial aid programs. Substantive Change Restriction status alters the timelines and procedures for certain categories of substantive changes, as identified in Table 3 below.

Table 2. Benedict College Substantive Change Submission Deadlines (if NOT on Substantive Change Restriction)

	SACSCOC Approval Type: Notification Only (NO) Full Board (FB) Executive Council (EC)	Internal BC Due Date for 7/01 Implementation	Internal BC Due Date for 1/01 Implementation	Fee Required?	Committee Visit Required?	Affected by Sub Change Restriction?
Institutional Level: Mission and Organizational Structure						
Substantially changing the established mission or objectives of an institution or its programs	EC	11/15	6/01	Yes	No	No
Changing the legal status, form of control, or ownership of an institution	NO & FB	2/15	8/01	Yes	Yes	No
Changing the governance of an institution	NO & FB	2/15	8/01	Yes	Yes	No
Institution Closure	EC	11/15	6/01	No	No	No
Institution Relocation	EC	11/15	6/01	Yes	No	No
Acquiring another institution or any program or location of another institution	NO & FB	2/15	8/01	Yes	Yes	No
Institutional Contingency Teach-Out Plan in response to SACSCOC/federal/state sanctions	EC	11/15	6/01	No	No	No
Merging/consolidating two or more institutions	NO & FB	2/15	8/01	Yes	Yes	No
Relocating an off-site non-branch campus	NO	-	-	No	No	No
Relocating an off-site branch campus	EC	11/15	6/01	Yes	No	No
Adding a new off-campus instructional site/additional location including a branch campus with 25-49% of a program's instruction	NO	-	-	No	No	No
Adding a new/additional off-campus instructional site including a branch campus with 50% or more of a program's instruction	1 st or 2 nd – FB 3 rd or more – EC	2/15 11/15	8/01 6/01	Yes Yes	Contingent Contingent	Yes Yes
Off-Campus Site Name or Address Change	NO	-	-	No	No	No
Closing an off-campus site	EC	11/15	6/01	No	No	No
Re-Opening an off-campus site within 5 years	NO	-	-	No	No	No
New degree level (higher or lower) that is a significant departure	FB	2/15	8/01	Yes	Yes	No
New degree level (lower and embedded) that is not a significant departure	EC	11/15	6/01	Yes	No	No
New institutional student progress measures (e.g., clock hours/credit-hours; semesters/trimesters/quarters; time-/non-time-based)	EC	11/15	6/01	Yes	No	No
Institutional approval to add first distance education program (50% or more)	EC	11/15	6/01	Yes	No	No
Institutional Approval to add first competency-based education program (50% or more) with Course/Credit-based approaches	EC	11/15	6/01	Yes	No	No

Table 2. (cntd.)

	SACSCOC Approval Type: Notification Only (NO) Full Board (FB) Executive Council (EC)	Internal BC Due Date for 7/01 Implementation	Internal BC Due Date for 1/01 Implementation	Fee Required?	Committee Visit Required?	Affected by Sub Change Restriction?
Program Changes						
New programs at current degree level with 50-100% new content	EC	11/15	6/01	Yes	No	Yes
New programs at current degree level with 25-49% new content	NO	-	-	No	No	Yes
New programs at a new degree level	EC	11/15	6/01	Yes	No	Yes
New programs requiring prior learning	NO	-	-	No	No	Yes
Correspondence Education	EC	11/15	6/01	Yes	No	No
New method of delivery (distance education, competency-based education, or face-to-face instruction) added to existing program (≥50%)	1 st CBE or DE – EC Subsequent - NO	1 st - 11/15 -	1 st - 6/01 -	Yes No	No No	Yes Yes
Cooperative academic arrangements with Title IV Entities if 50% or more or essential to program continuance	NO	-	-	No	No	No
Cooperative academic arrangements with Non-Title IV Entities for 25-50% of content	EC	11/15	6/01	Yes	No	Yes
Cooperative academic arrangements with Non-Title IV Entities for < 25% of content	NO	-	-	No	No	Yes
New competency-based programs with 25-49% earned via direct assessment	NO	-	-	No	No	No
New competency-based programs with 50% or more earned via direct assessment	FB	2/15	8/01	Yes	Yes	No
Clock-Credit Hour Conversion for a program	EC	11/15	6/01	No	No	No
Program length changes ≥25% (clock hours or competencies demonstrated) that result in increased time to completion	EC	11/15	6/01	Yes	No	Yes
Joint Academic Awards with non-SACSCOC Institution	EC	11/15	6/01	Yes	No	No
Joint Academic Awards with SACSCOC Institution	NO	-	-	No	No	No
Dual academic awards	NO	-	-	No	No	No
Re-opening a program closed for fewer than 5 years	NO	-	-	No	No	No
Program Closure and Teach-Out Plan	EC	11/15	6/01	No	No	No

Table 3. Benedict College Substantive Change Submission Deadlines (if ON Substantive Change Restriction)

	SACSCOC Approval Type: Notification Only (NO) Full Board (FB) Executive Council (EC)	Internal BC Due Date for 7/01 Implementation	Internal BC Due Date for 1/01 Implementation	Fee Required?	Committee Visit Required?	Affected by Sub Change Restriction?
Program Changes						
Adding a new/additional off-campus instructional site including a branch campus with 50% or more of a program's instruction	FB	2/15	8/01	Yes	Contingent	Yes
New programs at current degree level with 25-100% new content	EC	11/15	6/01	Yes	No	Yes
New programs requiring prior learning	EC	11/15	6/01	Yes	No	Yes
New method of delivery (distance education, competency-based education, or face-to-face instruction) added to existing program (≥50%)	EC	11/15	6/01	No	No	Yes
Cooperative academic arrangements with Non-Title IV Entities for 0-50% of content	EC	11/15	6/01	Yes	No	Yes
Program length changes ≥25% (clock hours or competencies demonstrated) even if time to completion is not increased	EC	11/15	6/01	Yes	No	Yes

UNIT RESPONSIBILITIES

SACSCOC Liaison

The SACSCOC Liaison is responsible for understanding SACSCOC accreditation and substantive change standards and ensuring that the college remains in compliance with all reporting requirements. The liaison is to remain abreast of any changes to SACSCOC policy and will keep senior administration informed of developments that will impact campus operations and decision-making. The liaison will also assume the following responsibilities:

- Developing the campus substantive change policy;
- Reviewing the policy and procedures annually to ensure alignment with any changes in SACSCOC's accreditation or substantive change standards;
- Disseminating substantive change procedures to campus constituencies, as needed;
- Consulting with unit constituencies to determine whether proposed changes are substantive;
- Communicating with SACSCOC staff to clarify policy interpretation and application;
- Coordinating the development and submission of substantive change prospectuses, notifications, and monitoring reports required by SACSCOC;
- Maintaining historical records of the college's substantive change submissions and decisions.

Campus Administrators

Since substantive changes can occur at any level of institutional operations (department, school, division, or campus-wide), it is important that campus administrators are familiar with the categories and definitions of substantive changes. Campus officers should consult with the SACS liaison at the earliest point possible in the development of any significant policy or procedural change in order to determine notification and or approval requirements for SACSCOC. If a change is deemed substantive, the liaison will help to determine the impact of SACSCOC policy upon the development and details of the campus actions and the implementation timeline. Campus administrators share the following responsibilities:

- Developing a working familiarity with both SACSCOC and Benedict substantive change policies;
- Consulting with the accreditation liaison when developing campus policies and procedures to identify substantive changes and reporting;
- Providing data and planning information needed to prepare substantive change submissions;
- Participating in sessions with on-site substantive change review teams, when required;
- Drafting/adjusting unit policies and procedures to align with SACSCOC directives;
- Proposing needed changes to the campus policy and procedures to promote efficiency in application and implementation.

Office of Institutional Research

The Office of Institutional Research will serve as the repository for policy amendments and substantive changes reported to SACSCOC. More specifically, the office assumes the following responsibilities:

- Providing data needed to determine substantive changes and prepare prospectuses and notifications;
- Publishing and updating the Substantive Change policy on the campus website;
- Archiving previous substantive change submissions and SACSCOC responses.

Office of Financial Aid

As federal sanctions impact the college's reporting requirements, the Office of Financial Aid should inform the SACSCOC liaison of any changes in institutional status, most notably if the College has been placed under provisional certification for participation in federal financial aid programs.

INTERNAL REVIEW PROCEDURES

Unit Actions: Campus units that are contemplating operational changes that may be considered significant departures should consult with the SACSCOC liaison as soon as possible to determine the college's reporting obligations. A written communication to the liaison should include significant details regarding the responsible unit and administrator, nature and scope of the change, rationale and audience served, proposed implementation timeline, and history of previous relevant changes (if known).

Liaison Actions: The liaison will provide a timely written response to inform whether SACSCOC notification or approval is required. The response may include: a determination of reporting requirement; request for additional details, if needed; confirmed or amended implementation timelines; suggestions for proposal amendments to promote compliance; and copies of relevant SASCOG guidelines, definitions, or procedures.

If a change is considered a reportable substantive change, the liaison and unit representative(s) will work together to complete the notification or prospectus by the required SACSCOC deadline. The liaison will then assume responsibility for securing the President's approval and signature, delivering the document to SACSCOC and arranging any needed payments.

Executive Administration Actions: Decisions which rise to the level of substantive change require approval by the Board of Trustees, the President, and/or the Executive Cabinet. Changes will not be advanced to SACSCOC unless they have secured executive-level approval, as required by campus policies. Furthermore, only the President and accreditation liaison are authorized to submit substantive changes to SACSCOC on behalf of the College.

COMPLIANCE WITH SUBSTANTIVE CHANGE POLICY

Non-compliance with SACSCOC substantive change requirements can jeopardize the college's accreditation status and its eligibility to distribute Title IV funds. Therefore, all campus constituencies, without exception, are obligated to adhere to the requirements of both campus and SACSCOC substantive change policies.

REFERENCE MATERIALS

The following materials provide additional needed details related to SACSCOC substantive change reporting and approval processes.

[SACSCOC Substantive Change Site](#)

[SACSCOC Substantive Change Policy and Procedures](#)

[SACSCOC Principles of Accreditation: Foundation for Quality Enhancement, Standard 14.2](#)

[Documentation Templates in Preparation for a Substantive Change Committee Visit to an Institution](#)

[Distance Education and Correspondence Courses Policy Statement](#)

[Direct Assessment Competency-Based Educational Programs](#)

[Seeking Accreditation at a Higher or Lower Degree Level Policy](#)