


Slide 1

**Complying With 14.2  
(Substantive Change)  
[Formerly CS 3.12.2]  
Does Not Have to be Difficult!**

December 9, 2018



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Slide 2

Daniel S. Mynatt,  
Vice Provost for Institutional  
Effectiveness  
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Slide 3

Complying With 14.2 Does Not Have to be Difficult!

**Learning Outcome**

1. You will be able to keep your institution out of Substantive Change Compliance trouble.

(Whether something represents a Substantive Change is a different, albeit related question. Go to one of the Substantive Change workshops for expert advice.)



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Slide 4

Complying With 14.2 Does Not Have to be Difficult!

### Session Outline

1. The Problem
  - a. My inspiration for this session!
  - b. How Often is this Principle Cited?
  - c. Why do institutions have problems with 14.2?



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Slide 5

Complying With 14.2 Does Not Have to be Difficult!

### Session Outline

2. The Solution
  - a. Appropriate Supervision
  - b. Policy Solution
  - c. Curricular Solution
  - d. Adequate Document Archive



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Slide 6

Complying With 14.2 Does Not Have to be Difficult!

### Session Outline

3. Sample Compliance Narratives
  - That's where the real fun begins
  - Read them like you are an Off-Site Review Committee member.



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Slide 7

Complying With 14.2 Does Not Have to be Difficult!

### The Problem

#### My Personal Experience

- This session was inspired by my experience chairing Committees.
- FYI... The Chair is usually the person assigned to evaluate 14.2 on review Committees.



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Slide 8

Complying With 14.2 Does Not Have to be Difficult!

### The Problem

#### My Personal Experience

- I was continually frustrated by schools stumbling over 14.2 because they realized too late that they had a problem.
- I hope that, at the end of this session, you say ***"This was a waste of time. Danny's ideas are simple common knowledge. Everybody does these things."***



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Slide 9

Complying With 14.2 Does Not Have to be Difficult!

### The Problem

#### How Often is This Principle Cited?

Too Often—See Below



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Slide 10

Complying With 14.2 Does Not Have to be Difficult!

Most Frequently Cited Principles,  
Class of 2014

Top 10 Most Frequently Cited Principles in Reaffirmation Reviews: 2014 Reaffirmation Class Institutions (n=43)

| Review Stage I: OVP Site Committee |                                   | Review Stage II: OSR Site Committee |    | Review Stage III: CAB (Board of Trustees) |                      |                         |                                   |      |                      |                                   |      |
|------------------------------------|-----------------------------------|-------------------------------------|----|---|----------------------|-------------------------|-----------------------------------|------|----------------------|-----------------------------------|------|
| Rank                               | Requirement/Standard              | Institutions<br>in Need             | %  | Rank                                      | Requirement/Standard | Institutions<br>in Need | %                                 | Rank | Requirement/Standard | Institutions<br>in Need           | %    |
| 1                                  | 3.2.1 Faculty Governance          | 90%                                 | 1  | 3.2.2 Quality Enhancement Plan            | 87%                  | 1                       | 3.2.3.1.1.1 - Educational Program | 100% | 1                    | 3.2.3.1.1.1 - Educational Program | 100% |
| 2                                  | 3.2.1.1.1.1 - Educational Program | 83%                                 | 2  | 3.2.1.1.1.1 - Educational Program         | 23%                  | 2                       | 3.2.3.1.1.1 - Educational Program | 86%  | 2                    | 3.2.3.1.1.1 - Educational Program | 86%  |
| 3                                  | 3.2.1.1.1.2 - Educational Program | 80%                                 | 3  | 3.2.1.1.1.2 - Educational Program         | 20%                  | 3                       | 3.2.3.1.1.2 - Educational Program | 86%  | 3                    | 3.2.3.1.1.2 - Educational Program | 86%  |
| 4                                  | 3.2.1.1.1.3 - Educational Program | 80%                                 | 4  | 3.2.1.1.1.3 - Educational Program         | 14%                  | 4                       | 3.2.3.1.1.3 - Educational Program | 86%  | 4                    | 3.2.3.1.1.3 - Educational Program | 86%  |
| 5                                  | 3.2.1.1.1.4 - Educational Program | 80%                                 | 5  | 3.2.1.1.1.4 - Educational Program         | 14%                  | 5                       | 3.2.3.1.1.4 - Educational Program | 86%  | 5                    | 3.2.3.1.1.4 - Educational Program | 86%  |
| 6                                  | 3.2.1.1.1.5 - Educational Program | 80%                                 | 6  | 3.2.1.1.1.5 - Educational Program         | 14%                  | 6                       | 3.2.3.1.1.5 - Educational Program | 86%  | 6                    | 3.2.3.1.1.5 - Educational Program | 86%  |
| 7                                  | 3.2.1.1.1.6 - Educational Program | 80%                                 | 7  | 3.2.1.1.1.6 - Educational Program         | 14%                  | 7                       | 3.2.3.1.1.6 - Educational Program | 86%  | 7                    | 3.2.3.1.1.6 - Educational Program | 86%  |
| 8                                  | 3.2.1.1.1.7 - Educational Program | 80%                                 | 8  | 3.2.1.1.1.7 - Educational Program         | 14%                  | 8                       | 3.2.3.1.1.7 - Educational Program | 86%  | 8                    | 3.2.3.1.1.7 - Educational Program | 86%  |
| 9                                  | 3.2.1.1.1.8 - Educational Program | 80%                                 | 9  | 3.2.1.1.1.8 - Educational Program         | 14%                  | 9                       | 3.2.3.1.1.8 - Educational Program | 86%  | 9                    | 3.2.3.1.1.8 - Educational Program | 86%  |
| 10                                 | 3.2.1.1.1.9 - Educational Program | 80%                                 | 10 | 3.2.1.1.1.9 - Educational Program         | 14%                  | 10                      | 3.2.3.1.1.9 - Educational Program | 86%  | 10                   | 3.2.3.1.1.9 - Educational Program | 86%  |

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Slide 11

Complying With 14.2 Does Not Have to be Difficult!

Most Frequently Cited Principles,  
Class of 2015

Top 10 Most Frequently Cited Principles in Reaffirmation Reviews: 2015 Reaffirmation Class Institutions (n=41)

| Review Stage I: OVP Site Committee |                                   | Review Stage II: OSR Site Committee |    | Review Stage III: CAB (Board of Trustees) |                      |                         |                                   |      |                      |                                   |      |
|------------------------------------|-----------------------------------|-------------------------------------|----|---|----------------------|-------------------------|-----------------------------------|------|----------------------|-----------------------------------|------|
| Rank                               | Requirement/Standard              | Institutions<br>in Need             | %  | Rank                                      | Requirement/Standard | Institutions<br>in Need | %                                 | Rank | Requirement/Standard | Institutions<br>in Need           | %    |
| 1                                  | 3.2.1 Faculty Governance          | 90%                                 | 1  | 3.2.2 Quality Enhancement Plan            | 89%                  | 1                       | 3.2.3.1.1.1 - Educational Program | 100% | 1                    | 3.2.3.1.1.1 - Educational Program | 100% |
| 2                                  | 3.2.1.1.1.1 - Educational Program | 80%                                 | 2  | 3.2.1.1.1.1 - Educational Program         | 31%                  | 2                       | 3.2.3.1.1.1 - Educational Program | 90%  | 2                    | 3.2.3.1.1.1 - Educational Program | 90%  |
| 3                                  | 3.2.1.1.1.2 - Educational Program | 80%                                 | 3  | 3.2.1.1.1.2 - Educational Program         | 25%                  | 3                       | 3.2.3.1.1.2 - Educational Program | 90%  | 3                    | 3.2.3.1.1.2 - Educational Program | 90%  |
| 4                                  | 3.2.1.1.1.3 - Educational Program | 80%                                 | 4  | 3.2.1.1.1.3 - Educational Program         | 19%                  | 4                       | 3.2.3.1.1.3 - Educational Program | 90%  | 4                    | 3.2.3.1.1.3 - Educational Program | 90%  |
| 5                                  | 3.2.1.1.1.4 - Educational Program | 80%                                 | 5  | 3.2.1.1.1.4 - Educational Program         | 19%                  | 5                       | 3.2.3.1.1.4 - Educational Program | 90%  | 5                    | 3.2.3.1.1.4 - Educational Program | 90%  |
| 6                                  | 3.2.1.1.1.5 - Educational Program | 80%                                 | 6  | 3.2.1.1.1.5 - Educational Program         | 19%                  | 6                       | 3.2.3.1.1.5 - Educational Program | 90%  | 6                    | 3.2.3.1.1.5 - Educational Program | 90%  |
| 7                                  | 3.2.1.1.1.6 - Educational Program | 80%                                 | 7  | 3.2.1.1.1.6 - Educational Program         | 19%                  | 7                       | 3.2.3.1.1.6 - Educational Program | 90%  | 7                    | 3.2.3.1.1.6 - Educational Program | 90%  |
| 8                                  | 3.2.1.1.1.7 - Educational Program | 80%                                 | 8  | 3.2.1.1.1.7 - Educational Program         | 19%                  | 8                       | 3.2.3.1.1.7 - Educational Program | 90%  | 8                    | 3.2.3.1.1.7 - Educational Program | 90%  |
| 9                                  | 3.2.1.1.1.8 - Educational Program | 80%                                 | 9  | 3.2.1.1.1.8 - Educational Program         | 19%                  | 9                       | 3.2.3.1.1.8 - Educational Program | 90%  | 9                    | 3.2.3.1.1.8 - Educational Program | 90%  |
| 10                                 | 3.2.1.1.1.9 - Educational Program | 80%                                 | 10 | 3.2.1.1.1.9 - Educational Program         | 19%                  | 10                      | 3.2.3.1.1.9 - Educational Program | 90%  | 10                   | 3.2.3.1.1.9 - Educational Program | 90%  |

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Slide 12

Complying With 14.2 Does Not Have to be Difficult!

The Problem

Why do institutions have problems with  
14.2?

**Neglect**—Nobody's Minding the Store

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Slide 13

Complying With 14.2 Does Not Have to be Difficult!

### The Solution

Appropriate Supervision

- a. The Provost should appoint someone whose job includes compliance with 14.2
- b. That person should understand Substantive Change and have the policy printed on his/her bookshelf!



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Slide 14

Complying With 14.2 Does Not Have to be Difficult!



In this case, I do follow my own advice!!



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Slide 15

Complying With 14.2 Does Not Have to be Difficult!

### The Solution

Appropriate Supervision

- c. This person will probably be the Accreditation Liaison.
- d. Send this person to one of the Substantive Change workshops! Get to know Kevin Sightler!!



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Slide 16

Complying With 14.2 Does Not Have to be Difficult!

**The Solution**

Policy Solution

Notice the difference between 3.12.1 and 14.2



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Slide 17

Complying With 14.2 Does Not Have to be Difficult!


**14.2—2018 Principles**

*The institution has a policy and procedure to ensure that all substantive changes are reported in accordance with SACSCOC's policy.*

VS

**3.12.1—2012 Principles**

*The institution notifies the Commission of changes in accordance with the Commission's substantive change policy and, when required, seeks approval prior to the initiation of changes.*



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Slide 18


Complying With 14.2 Does Not Have to be Difficult!

**The Solution**

Policy Solution

So, what is different between 3.12.1 and 14.2?

- The requirement to have a policy and procedure is now explicitly in the Principles (instead of in the Handbook).



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Slide 19

**University of Mary Hardin-Baylor**

**University Policy #** ACA 7.21  
**Subject:** Substantive Change to Academic Programs  
**Effective Date:** July 1, 2012

Before initiating any significant changes in academic programming, such as adding a new degree program, delivering an existing on-campus program in a distance/online mode, offering a program at a higher degree or credential level, or offering an existing program in a new location, among others, the dean of the college initiating the change must notify the Provost's office in writing as soon as such a change is considered.

Additionally, the Provost's office will review each proposal made to the curriculum change committee to determine if it should be considered a substantive change and therefore need to go through the notification and/or approval processes for SACSCOC and any program-specific accreditors. In the event of a dispute as to whether a proposed change is considered substantive in nature, final review of the proposed change will be the responsibility of the Provost.

This requirement is intended to ensure compliance with external accreditation requirements, including those of the Southern Association of Colleges and Schools (SACSCOC) and any relevant program-specific accrediting agency.

Depending on the scope of the initiative, several months or longer lead time is necessary to meet accreditation standards of notification and approval before the change can be implemented.

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Slide 20

Complying With 14.2 Does Not Have to be Difficult!

**The Solution**

**Policy Solution**

- If you don't have a Substantive Change policy, borrow one and edit it to meet your institution's needs.
- "What in academia is plagiarism...."
- Do it now! Don't wait until your next Reaffirmation.



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Slide 21

Complying With 14.2 Does Not Have to be Difficult!

**The Solution**

**Curricular Solution**

- Set up a "speed bump" in your curricular approval process so that important changes are reviewed by your SACSCOC Accreditation Liaison.



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Slide 25

Complying With 14.2 Does Not Have to be Difficult!

### The Solution

Adequate Document Archive

- Who is responsible for maintaining the archive?
  - Provost?
  - SACSCOC Accreditation Liaison?



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Slide 26

Complying With 14.2 Does Not Have to be Difficult!

### Sample Compliance Narratives

- I do not pretend to be an expert on whether something is a Substantive Change.
- These are just examples of processes gone awry, all of which were easily preventable.



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Slide 27

Complying With 14.2 Does Not Have to be Difficult!

### Sample Compliance Narratives

- My thoughts on these scenarios are nothing but my opinion, based on my experience with Committees. Your mileage may vary.
- For the following scenarios, imagine that you are an **Off-Site Committee Reviewer**.



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Slide 28

Complying With 14.2 Does Not Have to be Difficult!

Highland University has notified SACSCOC of five substantive changes since the last reaffirmation.

- Four were approved by SACSCOC, and the appropriate correspondence is attached.
- One is still in process with the Substantive Change Office.

As part of the reaffirmation preparations, the VPAA drafted a policy on substantive change, which was posted for review and approved by the President. It awaits final approval by the Board of Trustees, which should occur when the Board reviews new policies at its February meeting.

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Slide 29

Complying With 14.2 Does Not Have to be Difficult!

Sample Compliance Narratives

- The peer review is a snapshot of current conditions.
- No policy = Not in Compliance



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Slide 30

Complying With 14.2 Does Not Have to be Difficult!

Sweeten Creek University adopted a substantive change policy. Since our last reaffirmation, we have notified SACSCOC of two substantive changes.

- One was for a Master of Ministry. Documentation is attached.
- The second was for two off-campus sites where 100% of an approved MEd is delivered. Both off-campus sites have been in place for 6 years. During preparation of the Compliance Certification, it was discovered that both had moved beyond 50% delivery. Documentation has been submitted to SACSCOC.

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Slide 31

Complying With 14.2 Does Not Have to be Difficult!

### Sample Compliance Narratives

- I refer to this as the "Ticking Time Bomb" Scenario.
- A program grows at an off-campus site, and no one notices when it has moves beyond 50%.
- How much trouble the institution is in depends on whether this is one of the first three 50%+ off-campus sites, where a Committee visit would be required (see Sub. Change policy, p. 11).



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Slide 32

Complying With 14.2 Does Not Have to be Difficult!

### Sample Compliance Narratives


- The off-campus sites should have been reported once it moved past 25%.

**Changes Requiring Notification Only**

Substantive changes requiring an institution to notify the President of SACSCOC prior to implementation by the institution are as follows:

- For site-based/classroom group instruction (where the instructor is present)
  - Initiating an off-campus site at which a student may earn at least 25% but less than 50% of credits toward a program. The letter of notification must include the starting date and complete physical address of the new site.

(Sub. Change Policy, p. 20)



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Slide 33

Complying With 14.2 Does Not Have to be Difficult!

### Sample Compliance Narratives

- Since the program is not new, there was no reason to involve the Accreditation Liaison on the curriculum.
- The only way to defuse the ticking time bomb is to make sure that your Program Coordinator knows the 25% rule and the 50% rule...and monitors how much of a program is being offered.



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Slide 34

Complying With 14.2 Does Not Have to be Difficult!

French Broad College adopted a substantive change policy. We have notified SACSCOC of three substantive changes, all of which were dual degree agreements with other regionally accredited institutions.

- The signed agreements from the other schools are attached, along with acceptances from SACSCOC.
- The third was an Engineering dual degree agreement with Pisgah Institute of Technology. There is no evidence that SACSCOC was notified. We have now notified the Commission and are working to resolve this situation.

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Slide 35


Complying With 14.2 Does Not Have to be Difficult!

- From the policy "Agreements Involving Joint and Dual Academic Awards."

**Reporting Responsibilities and Procedures**  
When Developing Agreements for Dual Academic Awards

**Prior Notification:** Entering into an agreement with a member or non-member institution involving a dual academic award is a substantive change that requires an institution to submit a letter of notification six months prior to implementation of the agreement and a final signed copy of the agreement. **Final written acceptance of that notification and agreement by SACSCOC is required before implementation of the provisions of the agreement.** (See note at the end of this policy for additional requirements if the agreement involves a new program which is significantly different from currently offered programs or an off-campus site where students may earn 50 percent or more of the credit in a program.) Institutions are that the agreement will reflect assumption of responsibility on the part of the member institution for the academic quality of any course work or credit recorded on the institution's transcript and accepted toward a dual academic award. The following should be submitted to SACSCOC:

- A notification letter that includes a statement of intent, the anticipated beginning date of the agreement, a description of the agreement, the complete address/location of the parties involved in the agreement, and information for contact persons at each participating institution regarding the agreement.
- A copy of the final signed agreement.

 MARSHALL UNIVERSITY  
MARSHALL, WEST VIRGINIA • ESTABLISHED IN 1837

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Slide 36

Complying With 14.2 Does Not Have to be Difficult!

Sample Compliance Narratives

- Notification and acceptance did not occur.
- The institution might as well say "We have a substantive change policy and procedure, and it is broken."

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MARSHALL, WEST VIRGINIA • ESTABLISHED IN 1837

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Slide 37

Complying With 14.2 Does Not Have to be Difficult!

Sample Compliance Narratives

Lexington Avenue Technical College has had no substantive changes since our last reaffirmation.



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Slide 38

Complying With 14.2 Does Not Have to be Difficult!

Sample Compliance Narratives

- Is there or is there not a policy on Substantive Change? I suppose the On-Site Committee will have to sort that out.
- The absence of a policy is itself a violation of 14.2, but the purpose of the policy is to help avoid an unreported Substantive Change.



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Slide 39

Complying With 14.2 Does Not Have to be Difficult!

Twin Leaf College has a substantive change policy and notified SACSCOC of five substantive changes, all dual degree agreements:

- All five were accepted by SACSCOC.

Due to several personnel changes in the Provost's Office:

- Signed copies of one the dual degree agreements is unavailable.
- Signed copies of three dual degree agreements pre-dating the Substantive Change principle are unavailable.

Unsigned copies of all missing documents are provided while signed copies are in process.

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Slide 40

**Complying With 14.2 Does Not Have to be Difficult!**

**Sample Compliance Narratives**

Whether or not Twin Leaf College is in compliance with 14.2 could be debated:

- All of the substantive changes were approved. Correspondence could be produced to demonstrate this.
- Yet, several of the signed dual degree agreements are missing.

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Slide 41

**Complying With 14.2 Does Not Have to be Difficult!**

- From the policy "Agreements Involving Joint and Dual Academic Awards."

Reporting Responsibilities and Procedures  
When Developing Agreements for Dual Academic Awards

**Prise Notification:** Entering into an agreement with a member or non-member institution involving a dual academic award is a substantive change that requires an institution to submit a letter of notification six months prior to implementation of the agreement and a final signed copy of the agreement. Formal, written acceptance of that notification and agreement by SACS/COC is required before implementation of the provisions of the agreement. (See note at the end of this policy for additional requirements if the agreement involves a new program which is significantly different from currently offered programs or an off-campus site where students may earn 50 percent or more of the credit in a program.) Expectations are that the agreement will reflect assumptions of responsibility on the part of the member institution for the academic quality of any course work or credit recorded on the institution's transcript and accepted toward a dual academic award. **The following should be submitted to SACS/COC:**

- A notification letter that includes a statement of intent, the anticipated beginning date of the agreement, a description of the agreement, the complete address/location of the parties involved in the agreement, and information for contact process at each participating institution regarding the agreement.
- A copy of the final signed agreement.

MEMBER INSTITUTION  
**NORTH HAVEN COLLEGE**  
Member of the Tennessee College System

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Slide 42

**Complying With 14.2 Does Not Have to be Difficult!**

**Sample Compliance Narratives**

Regardless of what happens with 14.2, in my opinion, Twin Leaf College is clearly out of compliance with 10.9 (Cooperative Academic Arrangements).

- If you have no signed agreement, you have no agreement.

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Slide 43

Complying With 14.2 Does Not Have to be Difficult!

- From the Resource Manual for 10.9 (Cooperative Academic Arrangements)

*These types of cooperative academic arrangements are considered substantive changes, and require submission of the signed contract or agreement prior to initiation. If more than one SACSOC institution is involved in the agreement, then each should submit the information (or one submission with a coversheet signed by an appropriate representative of each affected SACSOC institution). A major revision of the contract or agreement should also be submitted. See SACSOC policy Substantive Change for SACSOC Accredited Institutions.*



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Slide 44

Complying With 14.2 Does Not Have to be Difficult!

**And Finally...What happens to you if you have an unreported Substantive Change?**

- From Appendix A of the Substantive Change Policy.
- This goes on for another page...

**3. Policy Statement on Unreported Substantive Change**

Unreported substantive changes requiring prior notification or prior approval come to the attention of the Commission through two means: (1) information discovered by the institution or by the Commission between periods of formal review by the Commission and (2) information discovered during an off-site or an on-site review by the Commission. The procedure for handling such unreported substantive changes is as follows:

- Upon discovery, the institution formally notifies the SACSOC President of the unreported substantive change. The letter of notification must include the date of the original implementation of the change. A completed prospectus or application should accompany the letter for cases outlined in Procedure One of this document.

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Slide 45

Complying With 14.2 Does Not Have to be Difficult!

**What happens to you if you have an unreported Substantive Change?**

- Worst Case Scenario! Yikes!!

**Failure to Comply with Reporting Requirements**

If an institution fails to follow SACSOC substantive change policy and procedures, it may lose its Title IV funding 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 SACSOC Board of Trustees for the imposition of a sanction or for removal from membership.

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Slide 46

Complying With 14.2 Does Not Have to be Difficult!

Questions  
Comments  
Concerns



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Slide 47

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