Complying With 14.2 (Substantive Change)
[Formerly CS 3.12.2]
Does Not Have to be Difficult!
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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.)
The Problem
- My inspiration for this session!
- How often is this principle cited?
- Why do institutions have problems with 14.2?

The Solution
- Appropriate supervision
- Policy solution
- Curricular solution
- Adequate document archive

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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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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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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The Problem
How Often is This Principle Cited?
Too Often—See Below
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Most Frequently Cited Principles, Class of 2014

The Problem
Why do institutions have problems with 14.2?

Neglect—Nobody’s Minding the Store
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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.

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

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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The Solution
Policy Solution

Notice the difference between 3.12.1 and 14.2

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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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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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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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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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The Solution

Curricular Solution

- Who is responsible if a Substantive Change makes it through the approval process without being noticed?
- That question needs to be clarified because the stakes could be high!

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The Solution

Adequate Document Archive

- Where is your SACSCOC document file kept?
  - It needs to be somewhere impervious to the "due to transition in leadership, we lost our documents" excuse.
  - Scan everything of importance when it comes in!
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The Solution
Adequate Document Archive

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

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

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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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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 moved 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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Sample Compliance Narratives

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

Change Reporting Notification Only

(See Sub. Change Policy, p. 20)

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

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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Sample Compliance Narratives

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

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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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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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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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• From the policy “Agreements Involving Joint and Dual Academic Awards.”

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

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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....

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

• Worst Case Scenario! Yikes!!
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Questions
Comments
Concerns

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