

Substantive Change Notification Procedure to Maintain Compliance with SACSCOC

This procedure document complements *USF Policy 10-061 (Substantive Change Reporting)* by providing details about types of substantive changes; limitations on implementing substantive changes prior to notifying SACSCOC and/or obtaining SACSCOC approval; procedures for reporting substantive changes; and costs associated with initiating substantive changes. Note that failure to follow SACSCOC's required procedures could result in SACSCOC putting USF on sanction, which will limit USF's ability to make substantive changes while on sanction **and for three years after being removed from sanction**, thereby greatly limiting USF's ability to adapt to changing budgets, student demand, employer needs, faculty changes, and other circumstances.

USF is required to notify our accrediting agency, the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), of substantive changes before implementing them. In certain circumstances (noted in the Appendix), USF is required to obtain approval from SACSCOC before implementing those changes. SACSCOC defines a substantive change as "a significant modification or expansion of the nature and scope of an accredited institution." The most common potential substantive changes made by USF involve:

- creating a new degree program, major, or certificate program;
- changing more than 25% of the discipline-specific coursework in an existing degree program, major, or certificate program;
- changing the length of a degree program, major, or certificate program by 25% or more;
- requiring prior learning for admission into a degree program, major, or certificate program;
- adding a method of delivering an existing degree program, major, or certificate program;
- making an existing degree program, major, or certificate program competency based;
- suspending or terminating a degree program, major, or certificate program at one or more locations where it is currently offered;
- suspending or terminating a mode of delivering a degree program, major, or certificate program at one or more locations where it is currently offered;
- creating a new off-campus instructional site, increasing the number of courses offered at an existing off-campus instructional site, or expanding curricular offerings at an off-campus instructional site (e.g., offering a second major);
- limiting courses or reducing curricular offerings at an off-campus instructional site, or closing the site entirely; and
- entering into an MOU, MOA, contract, or other written agreement with other institutions.

Other substantive changes specified by SACSCOC in its *Substantive Change Policy and Procedures* are itemized in the Appendix.

Note that SACSCOC must approve a teach out plan before admission to a program can be suspended at one or more locations or a mode of delivering a program is suspended, even if the department offering the program considers the suspension to be temporary, because SACSCOC must assure that students in the program have completion options that minimize disruption and extra costs to existing students. Furthermore, instructional sites are either open or closed. There is no such thing as an "inactive" instructional site. A decision to stop offering courses at an

instructional site requires prior authorization from SACSCOC. These “costs” of suspending curricular offerings and closing instructional sites should be considered before opening new instructional sites or expanding curricular offerings at existing sites.

Note also that SACSCOC requires the first two new instructional sites created after January 1, 2021 to undergo an extensive review which requires a comprehensive review of USF’s institutional capacities and resources by SACSCOC’s Board of Trustees, not simply a review of the department’s capacities and resources by SACSCOC’s staff, as was previously the case.

Procedure:

At the earliest stage of consideration, any proposed change that could be deemed substantive according to the most recent revision of SACSCOC’s *Substantive Change Policy and Procedures* (attached as an appendix) must be submitted in writing to the Provost and SACSCOC Accreditation Liaison.

The Provost and SACSCOC Accreditation Liaison will determine if a requested action is a substantive change for SACSCOC purposes. If a change is substantive, SACSCOC must be notified as much as 18 months prior to implementing the change. The Appendix includes a listing of substantive changes, timeline for notification or approval, documentation requirements for reporting the change to SACSCOC, and some cost information. Additional costs may be incurred if the substantive change requires a site visit by SACSCOC.

Substantive changes cannot be implemented without prior authorization from the SACSCOC Accreditation Liaison, who may require approval of documentation by, or an official receipt of documentation from, SACSCOC prior to granting that authorization. Note that any substantive change approved by SACSCOC must be implemented within two years of approval by SACSCOC. If the substantive change cannot be implemented within two years, the SACSCOC Accreditation Liaison should be notified as soon as possible, so s/he can notify SACSCOC and try to obtain a waiver of the two-year rule if there are extenuating circumstances.

Notification to the Provost and SACSCOC Liaison of Proposed Changes

Upon becoming aware of a proposed change that may be substantive, vice provosts, vice presidents, assistant/associate vice presidents, deans, and directors of the unit proposing the change should notify the Provost and SACSCOC Accreditation Liaison.

The academic associate deans in the colleges will notify the SACSCOC Accreditation Liaison of any potential substantive changes that are being considered by academic departments or college curriculum committees before those changes advance to either the Faculty Senate’s Undergraduate Council or Graduate Council, so the Liaison can review them before the Senate acts on them.

Late Notification to SACSCOC Liaison

If a substantive change has been implemented without notification to the SACSCOC Accreditation Liaison, the appropriate vice provost/vice president, dean, or designee has the

responsibility to notify the SACSCOC Accreditation Liaison immediately. The SACSCOC Accreditation Liaison is then responsible for notifying SACSCOC of the change.

To ensure that changes that may be considered substantive do not go unreported, which could jeopardize USF's institutional accreditation and/or result in USF being forced to return federal financial aid funds that have already been awarded to students, vice provosts, vice presidents, deans, directors, or their designees should review internal processes to ensure timely reporting of substantive changes, paying particular attention to changes that occur at off-campus instructional sites and to suspensions of academic offerings (including certificate programs) at any locations.

If an academic unit is considering any of the substantive changes listed in the Appendix, the college dean or designee must contact the Provost and SACSCOC Accreditation Liaison in writing months before the college hopes to implement the change. For changes requiring prior approval from SACSCOC, the process may take 18 months or more.

If a SACSCOC site visit will be required (as may be the case with international off-campus instructional sites), budget approval from Resource Management and Analysis (RMA) will be required before documentation is submitted to SACSCOC. The SACSCOC Accreditation Liaison can facilitate this budget approval process.