SUBSTANTIVE CHANGE MANUAL

A GUIDE TO SUBSTANTIVE CHANGE POLICIES AND PROCEDURES

ACCREDITING COMMISSION
FOR SENIOR COLLEGES AND UNIVERSITIES

WESTERN ASSOCIATION
OF SCHOOLS AND COLLEGES

2005
WASC has required prior approval of institutional substantive changes in degree programs, methods of delivery, and organizational changes since 1979. In 1994, the Higher Education Reauthorization Act led to a significant number of regulations concerning substantive change, and the US Department of Education began requiring federally mandated site visits to off-campus programs.

The substantive change process is designed to ensure the consistency of quality across all institutional operations, on and off campus and through distance education. The concern for quality has grown as off-campus programs have crossed regional and international boundaries, technology-mediated learning has flourished, and institutions have identified opportunities to partner with other institutions to offer joint degree programs.

Under both Commission policy and federal law, certain substantive changes are required to have prior approval. In its development of substantive change policies, WASC has responded to relevant Department of Education regulations (Refer to Section II: Substantive Change Policies). The procedures defined in this Substantive Change Manual provide guidelines for institutions to demonstrate compliance with these regulations, as well as other WASC requirements.

The source documents for this Substantive Change Manual, as well as resource materials that supplement this document, may be found on the Substantive Change Resources page of the WASC Senior website.

The Commission welcomes suggestions for improvement of the material found in this Substantive Change Manual and ways to make this document, and the substantive change process itself, more useful to institutions. Please send all comments and suggestions to the WASC office or through the WASC website at: www.wascweb.org/senior.
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How to Use this Manual
The primary objective of the Substantive Change Manual is to convey the policies and procedures of the substantive change process so that successful proposals will be submitted. The Manual is divided into five sections as outlined below, with a brief description of the content and general audience for whom the section is intended:

Section I: An Overview of the Substantive Change Process
This section contains a summary of the steps involved in the substantive change process and should be read by those new to the process.

Section II: Substantive Change Policies
This section defines the substantive change policies underlying the review process and should be read by those needing assistance in determining if a proposed change will require prior approval. This section also contains information on the Systems Review process for institutions with previous substantive change approvals.

Section III: Proposal Guidelines and Elements
This section contains proposal guidelines and includes the format and elements to address in a proposal. Proposals are to contain responses to each of the areas identified.

Section IV: Substantive Change Review Procedures
This section elaborates on each step of the process, summarized in Section I, and should be read by those who have not participated in a substantive change review.

Section V: Substantive Change Site Visit Procedures
This section describes the on-site evaluation process used for follow-up site visits after an approved program is initiated. This section also describes the on-site evaluation process used for visits required by the Commission.

For first-time users or those unfamiliar with the substantive change process, it is recommended that Sections I and II be read before submitting an application to WASC for a substantive change proposal.
This section contains basic information on the steps that an institution should follow to initiate the substantive change process. In addition to the overview provided in this section, a process checklist is available on the Substantive Change Resources page of the WASC Senior website to assist institutions in organizing the process. Institutions may also refer to the process flow diagram on page 7 that graphically illustrates the steps involved, from the initial submission of an application to the final action on a proposal. For more detailed information on each step within the process, please refer to Section IV: Substantive Change Review Procedures.

An institution is responsible for …

Determining Whether a Change is Considered Substantive
In determining whether a change is considered substantive, an institution should first refer to Section II: Substantive Change Policies. This section lists the categories and definitions of substantive changes needing prior approval by the Committee (and possibly the Commission) before implementation. Determining the type of change is very important, as it is the basis for how an institution will navigate through the substantive change process.

Submitting the Application Three Months Prior to the Anticipated Review Date
The next step in the process is for the Accreditation Liaison Officer (ALO) to complete an application form (found on page 9) and send it to the WASC office, preferably three months prior to the anticipated review date. The application will reserve a place on the Substantive Change Committee’s agenda, which frequently fills up several months in advance. Please refer to the timeline provided on page 8 when determining your proposed review date.

Developing the Proposal
Please refer to Section III: Proposal Guidelines and Elements for more information on developing the proposal. A template to assist institutions in developing the proposal is also available on the Substantive Change Resources page of the WASC Senior website.

Submitting the Proposal and Fee One Month Prior to the Anticipated Review Date
The proposal and the associated fee must be received one month in advance of the review date in order to confirm the calendared date with the Substantive Change Committee. Please note that five copies of all program-related proposals and nine copies of all degree level and organizational proposals must be submitted to the WASC office. Proposals should be spiral-bound (no binders) and should not exceed 20 pages. Appendices should be placed at the end of the proposal or in a separate volume.
Participating in a Conference Call on the Scheduled Review Date
For all substantive change proposals, a two-to-three person panel drawn from the Substantive Change Committee conducts the conference call review. The ALO will be sent an e-mail confirming the date and time of the review, as well as the dial-in information, at least two weeks prior to the call. The ALO should distribute this information to the other institutional representatives participating in the call and should send the names of those individuals to the substantive change program manager to include on the agenda. Once on the call, the institutional representatives will be interacting with the panel and should be prepared to answer any questions that the panel may pose.

Addressing Any Requests by the Committee as Noted in the Formal Action Letter
Within 24 hours of the call, the WASC staff liaison will inform the ALO of the Committee’s action. A formal action letter will follow within a few weeks detailing the specifics of the Committee’s review. The institution is responsible for addressing any requests made for additional information or follow-up as noted in the action letter.
**TIMEFRAME FOR SUBMITTING A PROPOSAL**

Institutions should refer to the timeline provided below to determine the approximate length of the substantive change process. Please note that:

- The timeline assumes that all internal approval processes have been received before the proposal is submitted for review.
- The Commission meets in February and June to review substantive change proposals, which may result in a longer WASC approval process.
- The timeline does not depict the action of a deferral with request for additional information, as the timeline will vary depending on the length of time that it takes an institution to respond to the request.

![Diagram showing the timeline for submitting a proposal](image-url)
SUBSTANTIVE CHANGE APPLICATION FORM

Date of Application: __________________________

From: _____________________________________ Accreditation Liaison Officer (ALO)
Cc: _______________________________________ Institutional WASC Staff Liaison

Name of Institution _______________________________________________________________________
Address ________________________________________________________________________________

ALO Phone/E-mail _______________________________________________________________________
Other Contact Person _____________________________________________________________________

Name of Proposed Program or Change _______________________________________________________________________

TYPE OF SUB CHANGE:

Committee Review

☐ New site (in WASC region, more than 25 miles)
☐ New site (out of WASC region)
☐ Modality (distance education)
☐ Blended (new site and modality)
☐ Existing degree level – outside scope of current degrees offered
☐ Existing degree level – increase in number of programs offered

Committee and Commission Review

☐ Joint Doctorate Program with ___________________________(Partnership Institution)*
☐ Move to ___Higher or ___Lower Degree Level
☐ Subsequent Programs at a New Degree Level
☐ Change in Mission
☐ Change in Legal Status
☐ Ownership____ Merger____ Sponsorship____
☐ Other (please list): _______________________

Anticipated Date of Proposed Program Start-up or Organizational Change: _______________________

Request of WASC Staff:

☐ Please schedule this proposal review for consideration by the Substantive Change Committee at its meeting of ________(month) ________(year), if available.
☐ Please have my Institutional WASC Staff Liaison contact me to discuss the nature of the proposed program or change.

Please refer to the WASC website at: www.wascweb.org/senior for the Schedule of Dues and Fees.

Submit this application form, preferably four months (120 days) prior to the anticipated date of the Committee meeting or nine months (270 days) prior to the anticipated date of the Commission meeting, if Commission review is expected. Please note that the Commission meets in February and June.

______________________________________________________________________________ ALO Signature

______________________________________________________________________________ *ALO of Partnering Institution Signature, if applicable

______________________________________________________________________________ President or Provost Signature

Mail to: WASC, Attn: Substantive Change Program Manager, 985 Atlantic Avenue, Suite 100, Alameda, CA 94501; or fax to: (510)748-9797. You will receive a tentative date for review by the Sub Change Committee within two weeks of the receipt of the form. Thank you.
SECTION II: SUBSTANTIVE CHANGE POLICIES

WASC POLICIES CONCERNING SUBSTANTIVE CHANGE

Definitions of Substantive Change
As defined in the Handbook of Accreditation, a substantive change at an accredited or candidate institution is defined as one that may significantly affect an institution’s quality, objectives, scope, or control. It is further defined by federal regulations as described below.

The Commission’s substantive change policies have been developed in response to concerns raised within the region by visiting teams, the Substantive Change Committee, and by the Commission itself. The concerns raised are: 1) the overall quality of distance education and off-campus programs; 2) distinctions between the on-campus and off-campus and distance education programs with regard to faculty responsibility and oversight, academic rigor, student support, adequacy of library and computer resources, and the nature of the general education component for the undergraduate degree; 3) capacity of the institution to offer programs at a higher or lower degree level than that previously offered by an institution; and 4) WASC accountability in responding to public inquires about the comparability of quality and the accreditation status of these kinds of programs.

Federal Regulations Concerning Substantive Change
US Department of Education regulations require that accrediting agencies maintain adequate policies to ensure that any substantive change to the educational mission, program, or programs of an institution does not adversely affect the capacity of the institution to continue to meet accreditation standards of its region. Importantly, the federal law mandates that accrediting agencies require institutions to obtain approval of the substantive change before it is included in the scope of the accreditation or preaccreditation previously granted to the institution.

WASC’s definition of substantive change is required to include at least the following types of changes, as defined in the Federal Register, volume 64, number 202, October 20, 1999:

- Any change in the established mission or objectives of the institution
- Any change in the legal status, form of control, or ownership of the institution
- The addition of courses or programs that represent a significant departure, in either content or method of delivery, from those that were offered when the agency last evaluated the institution
- The addition of courses or programs at a degree or credential level above that which is included in the institution’s current accreditation or preaccreditation
- A change from clock hours to credit hours
- A substantial increase in the number of clock or credit hours awarded for successful completion of a program
- The establishment of an additional location geographically apart from the main campus at which the institution offers at least 50 percent of an educational program
Additionally, the federal regulations require regional accreditation substantive change policies to address: 1) distance education; 2) branch campuses; and 3) site visits.

- The addition of courses or programs that represent a significant departure, in terms of either the content or method of delivery (i.e., distance education) from those that were offered when the agency most recently evaluated the institution.

- If the agency’s accreditation of an institution enables the institution to seek eligibility to participate in Title IV HEA programs, the agency’s procedures for the approval of an additional location (i.e., branch campuses or sites) must determine if the institution has the fiscal and administrative capacity to operate the additional location.

- The agency’s procedures must include a (site) visit to additional locations if the institution has:
  - A total of three or fewer additional locations;
  - Not demonstrated a proven record of effective educational oversight of additional locations; or
  - Been placed on Warning, Probation, or Show Cause by the agency.

The agency’s procedures must also include:

- An effective mechanism for conducting visits at reasonable intervals to institutions that operate more than three additional locations.

- An effective mechanism for conducting visits (at the agency’s discretion) for ensuring that institutions which experience rapid growth in the number of additional locations maintain educational quality.

### CATEGORIES OF SUBSTANTIVE CHANGE

WASC categorizes substantive changes by the level of review required to implement the proposed change. There are two levels of review:

- Committee review – changes involving alterations to traditional degree programs, such as online and off-campus programs.

- Committee and Commission review – complex changes, such as a new degree level, or any change that spans beyond a particular program and may affect the institution, such as a change in mission, ownership, etc.

Institutions are reminded that they should consult with their WASC staff liaison regarding the change being proposed, as the level of review not only relates to the type of change but also often relates to the context of the institution’s accreditation history.

WASC defines and organizes substantive change categories by the required level of review necessary to obtain approval. Substantive change categories respond directly to the federal as well as Commission requirements. In some cases, the federal requirements have been reworded for clarification.

### CHANGES REQUIRING COMMITTEE APPROVAL

These types of changes may be categorized by modality, site, duration, or by degree scope or number. Each type of change requiring Committee approval is defined below.

1) **New Modality: Distance Education**

New modality refers to any traditional on- or off-campus program that is proposed to be offered via distance education.
A distance education program is a program offered via satellite, Internet, or any other kind of technology-assisted medium where 50 percent or more of a degree program is offered or anticipated to be offered.

Refer to the Substantive Change Resources page of the WASC Senior website for more information on best practices in distance education.

2) New Site: Off-Campus

New site refers to any traditional on-campus program that is proposed to be offered off-campus. Institutions may call their off-campus sites branch campuses, satellite centers, extension programs, or other titles. For the purposes of this policy, types of sites are defined as any new location where 50 percent or more of a degree program is offered more than 25 miles from the home campus. A site visit is required by the US Department of Education for all changes of this type within six months after implementation. If an off-campus site is suspended for more than two years and then reopened, an institution should consult with their WASC staff liaison to determine if the existing site would need to be re-reviewed by the Committee.

An off-campus program is any program offered where 50 percent or more of a degree program is offered:

- Within the WASC region more than 25 miles from the home campus; or
- Outside the WASC region (new sites or additional programs at a new or approved site)
- Internationally – refer to the Substantive Change Resources page of the WASC Senior website for more information on best practices in international education programs

A regional center is an expanded off-campus site that serves as an administrative and support center for additional sites, in addition to serving as a facility for off-campus programs. The development of a regional center may be most effective for institutions that plan to offer multiple off-campus programs within 25 miles of a proposed regional center. Development of a regional center would allow an institution to open off-campus sites within 25 miles of the regional center without seeking prior approval from the Committee for each program or site. A specific review for approval of a regional center is required to achieve the exemption for additional sites.

3) Blended – New Site and Modality

A blended program is when 50 percent or more of a degree program is offered using a combination of on- or off-campus and/or distance education.

4) Duration: Change in Length of Degree Program

Duration is defined as a substantial change in the number of clock or credit hours awarded for successful completion of a program or the length of a program.

If an institution chooses to change the required clock hours, credit hours, or program length, it should consult with its WASC staff liaison to determine a course of action for prior approval by the Committee.

5) Program Scope: New Degrees at an Existing Degree Level

Program scope is defined as the addition of a new degree program at an existing degree level outside the disciplinary scope of current degrees being offered. For example, if an institution specializing in liberal arts education wanted to offer a professional degree program in business, architecture, or public policy, this would constitute a change in program scope.
Please consult with your WASC staff liaison when determining if a new program would constitute a change in scope.

6) Program Number: Increase in Degree Programs at an Existing Degree Level

Program number is defined as a substantial increase in degree granting programs at an existing degree level.

Please consult with your WASC staff liaison when determining if an increase in programs would constitute a substantive change.

Changes Requiring Committee and Commission Approval

1) Degree Level: New Degrees at a Higher or Lower Degree Level; Joint Degrees

This category includes three types of changes:
1) Addition of a degree program at a higher or lower level;
2) Subsequent programs at a new degree level; and
3) Joint degree programs

A site visit is required for the first program at a new degree level before the proposal can be reviewed by the Commission. A site visit may not be required for subsequent or joint degree programs. The Committee will decide whether a site visit is necessary during the review of the substantive change proposal.

If the institution has a comprehensive visit scheduled in the year following the application of the substantive change proposal, review of the proposal and of the readiness of the institution to support the proposed program(s) at the new or joint degree level will be included in the charge to the visiting evaluation team and will not be considered by the Substantive Change Committee.

- The addition of a degree program at a higher or lower level is defined as a program at a degree level different from that which was previously offered by the institution either at a higher or lower degree level.

Please contact your WASC staff liaison to determine the level of degree granting authority, if unknown.

- Subsequent programs at a new degree level are defined as programs proposed to be offered at a degree level that has previously been approved by the Commission for at least one other program, but at a degree level in which the institution does not have general degree granting authority.

Institutions will need to seek prior approval for all subsequent programs offered at the new degree level until the time the Commission grants the institution general degree granting authority at that degree level. If an institution has been approved by the Commission to offer a program at a new degree level (bachelor's, master's or doctoral), it does not have blanket authority to continue to initiate other programs at that degree level without prior approval from both the Committee and Commission. In some cases, particularly at the bachelor's and master's degree level, the Commission may authorize the initiation of subsequent programs if it feels that the institution's capacity to deliver such programs at the new degree level has been established. This would be reflected in the Commission action letter granting approval for the first program at the new degree level.
A joint degree program is defined as a program that is offered in partnership between two or more accredited institutions. If one or more of the institutions involved does not have general degree granting authority at the level of the proposed program, then the joint degree program is considered a substantive change under this degree level category.

The Committee treats the development of a joint doctoral degree program as similar to that of an institution moving to a higher degree level. Because some institutions are accredited at the associate’s, bachelor’s, and master’s degree level only, prior approval is needed for all new joint doctoral degree programs between an institution that does not offer doctoral degrees and an institution that operates at the doctoral level. Joint doctoral degree programs always require prior approval by both the Committee and the Commission.

For joint master’s or bachelor’s programs, prior Committee approval is needed when one or more of the partnering institutions does not offer the degree in the proposed academic discipline or does not offer programs in the proposed modality, i.e., online. Review by the Committee is necessary because the institution for which the proposed degree will require new or expanded resources must demonstrate that the capacity (resources, structures, finances, faculty) to offer the program is established. Joint master’s or bachelor’s proposals do not require Commission approval unless the Committee and/or WASC staff liaison find serious issues with the institutional capacity of one of the institutions or with the mechanisms for partnering campuses to engage in systematic assessment of educational effectiveness. Another criterion warranting both Committee and Commission review is whether one of the partnering institutions is on sanction.

The proposal for a joint degree program must be jointly developed by the partnering institutions, but should be submitted by the institutional partner that does not have general degree granting authority at the degree level being proposed or does not have a previous history or capacity to deliver in a particular modality or academic discipline. In addition, the Committee needs information concerning the support to be provided by the other degree granting institution and an assessment of the impact the program will have on that institution. Representatives of each of the respective institutions should be present for the conference call at the time the Committee reviews the proposal.

Please refer to Section II: Substantive Change Policies – Degree Granting Authority for more information on degree granting authority.

2) Organizational Change: Mission, Legal, or Control

Organizational changes are those that involve changes in legal status, control, or mission. Because this type of change impacts the institution in its entirety, it requires prior approval by both the Committee and the Commission.

- A change in legal status or form of control of the institution is defined as a change in ownership, sponsorship, or affiliation, i.e., a merger with another institution.

- A change in mission is defined as a significant change to the objectives of the institution.
The information described on the preceding pages is summarized in the chart below. The chart lists the substantive change categories associated with each level of review and informs the institution as to whether a site visit is required.

<table>
<thead>
<tr>
<th>Proposed Change*</th>
<th>Level of Review</th>
<th>Site Visit</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>NEW MODALITY</strong>**</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Distance Education: Internet, satellite, or other technology-mediated delivery mode (more than 50 percent of program)</td>
<td>Committee Review</td>
<td>No</td>
</tr>
<tr>
<td><strong>NEW SITE</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>New site within region less than 25 miles from home campus</td>
<td>No Review Needed</td>
<td>No</td>
</tr>
<tr>
<td>New site within region more than 25 miles from home campus***</td>
<td>Committee Review</td>
<td>Yes</td>
</tr>
<tr>
<td>New site outside WASC region</td>
<td>Committee Review</td>
<td>Yes</td>
</tr>
<tr>
<td>Same program as on campus, moved to new site within region (more than 25 miles from home campus)</td>
<td>Committee Review</td>
<td>Yes</td>
</tr>
<tr>
<td>Same program as on campus, moved to new site outside region</td>
<td>Committee Review</td>
<td>Yes</td>
</tr>
<tr>
<td>New site within 25 miles from an approved off-campus site</td>
<td>Committee Review</td>
<td>Yes</td>
</tr>
<tr>
<td>Relocation of home campus</td>
<td>WASC Staff Review</td>
<td>Contingent upon</td>
</tr>
<tr>
<td></td>
<td>Committee Review Possible</td>
<td>WASC Staff Review</td>
</tr>
</tbody>
</table>

*Institutions are reminded that they should consult with their WASC staff liaison regarding the category of the change being proposed as the category relates not only to the type of change, but also to the institution’s accreditation history and current status.

**Required by federal law to be reviewed at the time of the next comprehensive review.

***If an institution is proposing to offer a program on the campus of another WASC-accredited institution, which is more than 25 miles from the home campus, it is considered a new site and subject to prior review by the Substantive Change Committee.
## SUBSTANTIVE CHANGE CATEGORIES

<table>
<thead>
<tr>
<th>PROPOSED CHANGE*</th>
<th>LEVEL OF REVIEW</th>
<th>SITE VISIT</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>REGIONAL CENTERS</strong>**</td>
<td></td>
<td></td>
</tr>
<tr>
<td>New regional center</td>
<td>Committee Review</td>
<td>Yes</td>
</tr>
<tr>
<td>New site less than 25 miles from an approved regional center</td>
<td>No Review Needed</td>
<td>No</td>
</tr>
<tr>
<td>New site more than 25 miles from an approved regional center</td>
<td>Committee Review</td>
<td>Yes</td>
</tr>
<tr>
<td><strong>APPROVED SITES</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Additional program at an approved site within the WASC region</td>
<td>No Review Needed</td>
<td>No</td>
</tr>
<tr>
<td>Additional program at an approved site outside the WASC region</td>
<td>Committee Review</td>
<td>Possible***</td>
</tr>
<tr>
<td><strong>BLENDED</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Blended: 50 percent or more of a degree program being offered using a combination of on- or off-campus and/or distance education</td>
<td>Committee Review</td>
<td>Yes</td>
</tr>
<tr>
<td><strong>DURATION</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Substantial change in clock hours, credit hours or length of a program</td>
<td>Committee Review</td>
<td>No</td>
</tr>
<tr>
<td><strong>PROGRAM SCOPE</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>New program at an existing degree level outside the scope of current degrees offered</td>
<td>Committee Review</td>
<td>Possible***</td>
</tr>
<tr>
<td><strong>PROGRAM NUMBER</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Substantial increase in degree programs at existing degree level, on- or off-campus</td>
<td>Committee Review</td>
<td>Possible***</td>
</tr>
</tbody>
</table>

*Institutions are reminded that they should consult with their WASC staff liaison regarding the category of the change being proposed as the category not only relates to the type of change, but also relates to the institution's accreditation history and current status.

**A regional center is an expanded off-campus site that serves as an administrative and support center for additional sites in addition to serving as a facility for off-campus programs.

***Determined by the Substantive Change Committee Panel
# Substantive Change Categories

<table>
<thead>
<tr>
<th>Proposed Change*</th>
<th>Level of Review</th>
<th>Site Visit</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Degree Level</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Initiation of higher/ lower degree level</td>
<td>Committee Review</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Commission Action</td>
<td>Prior to Commission Action</td>
</tr>
<tr>
<td>Subsequent programs at a new degree level***</td>
<td>Committee Review</td>
<td>Possible**</td>
</tr>
<tr>
<td></td>
<td>Commission Action</td>
<td>Prior to Commission Action</td>
</tr>
<tr>
<td>Joint doctoral degree programs****</td>
<td>Committee Review</td>
<td>Possible**</td>
</tr>
<tr>
<td></td>
<td>Commission Action</td>
<td>Prior to Commission Action</td>
</tr>
<tr>
<td><strong>Organizational</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Change in mission or objective</td>
<td>Committee Review</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Commission Action</td>
<td>Prior to Commission Action</td>
</tr>
<tr>
<td>Change in legal status or forms of control – merger, ownership, affiliation, sponsorship</td>
<td>Committee Review</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Commission Action</td>
<td>Prior to Commission Action</td>
</tr>
</tbody>
</table>

*Institutions are reminded that they should consult with their WASC staff liaison regarding the category of the change being proposed as the category relates not only to the type of change, but also to the institution's accreditation history and current status.

**Determined by the Substantive Change Committee Panel

***Subsequent programs at a new degree level require Commission approval at the doctoral level; however, subsequent master's and baccalaureate programs may or may not be required to go to the Commission based on the recommendation of the Substantive Change Committee and the WASC staff liaison.

****For joint master's or baccalaureate programs, please consult with your WASC staff liaison.
SYSTEMS REVIEW

ACCELERATED REVIEWS AND EXEMPTION FROM SITE VISITS

Definition

The Systems Review is a process that allows institutions the opportunity to demonstrate the capacity to effectively design, deliver, and evaluate a cluster of programs within a particular program modality so that such programs can be implemented over a four-year period without seeking prior approval from the Committee.

Once the Systems Review approval is granted, the institution obtains accelerated reviews of substantive changes within the scope of the systems approval and exemption from the six-month, post-implementation site visit.

An institution may request a Systems Review approval for distance education and/or off-campus programs at either the institutional level or at the academic unit level (school, program, etc.).

Relationship of a Systems Review to the Comprehensive Accreditation Review Process

A Systems Review proposal is required to demonstrate institutional capacity to deliver the proposed cluster of programs within the expectations of the Handbook of Accreditation, and in response to the specific elements requested in this Substantive Change Manual. Proposals must demonstrate that an institution can deliver programs of high quality and rigor in alignment with the Standards and Criteria for Review.

For institutions requesting a Systems Review within one year of the Comprehensive Review, the Systems Review will be integrated into the Capacity and Preparatory Review process. Institutions requesting a Systems Review within a year of the Educational Effectiveness Review should consult with their WASC staff liaison for consent to add this component to the review. The elements for a Systems Review proposal identified on the next page should be addressed in a supplement to the institutional presentation.

Advantages of a Systems Review

One of the tenets of the new framework of accreditation is to reduce institutional burden. An approved Systems Review proposal offers advantages to institutions that have demonstrated a successful record of approved proposals and institutional capacity to implement additional programs. Such advantages are as follows:

- Programs (within the scope of the Systems Review approval) may be implemented within a four-year period with an accelerated process that avoids full Substantive Change Committee approval for each program within the scope of the Systems Review approval.
- Site visits are not required after program implementation. Programs will be reviewed selectively or comprehensively during the comprehensive accreditation review process.
- Preparation of a Systems Review proposal, including data collection, can be useful in the continuous institutional analysis of the educational effectiveness of off-campus and distance education programs.
**SYSTEMS REVIEW CRITERIA**

The Systems Review process is available to institutions that have been successful in implementing distance education and/or off-campus programs. An institution must not have any resource or capacity issues to be eligible for a Systems Review and it must have consulted and received approval from the WASC staff liaison before preparing a Systems Review proposal. A staff recommendation to develop a proposal is based on, but not limited by, whether an institution has been: 1) able to demonstrate significant experience in implementing off-campus and/or distance education programs normatively measured by three or more approvals by the Substantive Change Committee; and 2) accredited or reaccredited in its last comprehensive review without receiving a sanction or having serious problems identified affecting the quality of off-campus and/or distance education programs.

Systems Review proposals should address the following general elements and, depending upon the nature of the scope of the System Review being proposed, should also respond to the elements indicated under each distinct category below within the same proposal:

**General Elements for All Systems Review Proposals**

- Define the type of program or modality for which the institution is requesting approval.

- State the institutional mission and educational objectives, and describe how they align with the proposed programs in fulfilling institutional purposes and goals.

- Describe the formal processes for campus approval of new programs, including program need, faculty consultation and development, the conceptual design of the curricula, criteria for program approval and/or change or conversion, analysis of resource needs, and budget allocations.

- Clearly describe the student learning outcomes expected for the degree(s) being offered.

- Demonstrate faculty engagement and accountability in the assessment of student learning and results through program review findings, review of student work, evaluation of student achievement around articulated learning outcomes, etc.

- Describe ongoing internal evaluation and assessment processes such as program review, assessment results, and/or review of student work by faculty. Describe the formal process for decisions regarding the continuation, expansion or closure of programs within the scope of approval.

- Demonstrate the capacity and competence of full-time, core faculty in developing teaching criteria, and evaluating relevant program modalities. The proposal should assess whether it has an adequate number of faculty appropriately prepared for the particular modality.

- Show evidence that the institution provides adequate services for students in terms of: 1) access to library and learning resources, both electronically and physically; 2) access to faculty, librarians, or other academic personnel prepared to assist in the learning process; 3) advising services; 4) clearly defined admissions standards; and 5) computer services.

- Provide documentation and assurances of financial resources (as demonstrated by budgetary commitment within the context of a business plan), including how budget planning over the four-year period will respond to enrollment and retention.

- Describe the system that the institution has in place to measure, monitor, and ensure the quality of student learning and the educational effectiveness of existing programs, and how the proposed program(s) will fit into the assessment system. The proposal should show how evidence generated and analyzed by that system helps the institution to determine that sufficient capacity is present for the expansion of the proposed programs.
Specific Elements Relating to Off-Campus Programs

- Describe how the institution defines and evaluates its capacity and infrastructure to support a number of off-campus programs and how multiple sites have impacted resources and structures needed to sustain these programs.

- Describe how the institution evaluates the effectiveness of student learning for off-campus programs. Reflect on what the institution has learned from delivering off-campus programs over time, and how program quality and improvement will be sustained based on this experience.

- Provide an analysis of how faculty are organized and prepared to teach off-campus students. The proposal must provide evidence of faculty assessment of student learning in this modality and a summary of faculty development efforts to help instructors teach in this modality.

Specific Elements Relating to Distance Education Programs

Refer to Good Practices for Electronically Offered Degree and Certificate Programs adopted by the eight regional accrediting commissions to guide the development of quality distance learning programs as found on the Substantive Change Resources page of the WASC Senior website.

- Demonstrate the institution’s effectiveness in delivering distance education programs, including a description of how the institution has evaluated its capacity and infrastructure in supporting a number of online programs. By what criteria are distance education courses and programs evaluated? To what extent do the criteria include learning styles, information literacy and technological competencies, student-to-faculty and student-to-student interaction, and quality of student work?

- Show how distance education programs are consistent with institutional outcomes and educational objectives, and indicate the degree of institutional commitment to these programs.

- Describe how the institution evaluates the effectiveness of student learning for distance education programs. Reflect on what the institution has learned from delivering distance education programs over time, and how program quality and improvement will be sustained based on this experience.

- Provide an analysis of the sufficiency and quality of technical and physical resources required to deliver online programs, including how faculty are supported in the integration and use of technology in their teaching, the appropriateness of the learning environment, and the responsiveness of computer systems and support staff in aiding student achievement.

Specific Elements Relating to International Programs

In addition to responding to elements listed under off-campus programs, proposals including international programs must address the capacity of the institution (or academic unit) to successfully implement programs abroad. Refer to Principles of Good Practice in Overseas International Education Programs for non-US Nationals adopted by the eight regional accrediting commissions to guide the development of quality programs abroad as found on the Substantive Change Resources page of the WASC Senior website.
A Memorandum of Understanding between the partnering institutions needs to be included that details: 1) how cultural issues will be addressed; 2) involvement of local faculty (if appropriate); 3) provision of library materials and access; and 4) student affairs and advising support.

**Specific Elements Relating to Regional Centers**

- Describe how the institution defines the regional center or branch campus being proposed, including how it is distinct from regularly offered off-campus programs.

- Indicate the degree(s) being proposed, and the number of student cohorts, classes, and faculty estimated at the regional center.

- Describe the administrative structure responsible for the regional center or branch campus, including how the site is linked to regular campus support services and systems. Provide an organization chart to illustrate how the site is integrated into the campus academic and administrative structure.

- Provide evidence of how students and faculty will be effectively supported at that site and where in the total program of study those students will experience the home campus.

- Describe the technical and physical infrastructure and resources in support of that site, including the processes by which regular monitoring and review of effectiveness takes place.

**Specific Elements Relating to a Systems Review at the Same Academic Unit Level**

- Describe how the proposed program will align with institutional educational objectives.

- Describe the system of review that the program will undergo and how it relates to existing review and assessment practices.

- Provide an analysis of how the results of student learning will be shared with the broader academic community for self-review and improvement.

**Expedited Systems Review Process**

Once an institution has been granted a Systems Review approval, federal regulations require that future programs within the scope of the approved Systems Review be reported to WASC before program implementation. This brief report should describe the new program or site and indicate the capacity of the institution to offer the new program or site. Budget information should also be included in terms of start-up costs and revenues.

Expedited reports are reviewed and approved by WASC staff. Therefore, an institution does not need to submit an application form to schedule a review of the report. In cases where expedited reports raise questions about programs falling outside the approved scope of the Systems Review, or where an institution’s accreditation status has changed, i.e., has been placed on sanction, staff may recommend that the Committee provide an additional review.

Three copies of the report and a minimal fee are required to be submitted to the WASC office before program implementation. Please refer to the WASC Senior website for the Schedule of Dues and Fees.
Systems Review Renewal Process

After the four-year period of exemption from Committee approval has expired, an institution must submit a proposal to renew their Systems Review approval. The proposal should follow the guidelines for an initial Systems Review in an abbreviated format and should emphasize the lessons learned from the evaluation of several programs in the past four years. The proposal should also include updated documentation and assurances of financial resources (as demonstrated by budgetary commitment within the context of a business plan) and a reinforced plan for educational effectiveness. Please note that the validity of the programs implemented during the four-year period of exemption do not need to be re-evaluated after the four-year period expires. The intent of the Systems Review renewal process is for the institution to continue to be able to implement future programs without prior approval from the Committee.

Degree Granting Authority

WASC policy requires that institutions seek approval through the substantive change review process for proposed changes to the degree granting authority currently conferred by the Commission. Contact your WASC staff liaison to determine the degree granting authority currently conferred on your institution.

An institution must seek prior approval before implementing a program at a degree level in which it does not have general degree granting authority. Even if an institution receives an approval for a program at a new degree level, it must continue to seek prior approval for all subsequent programs at this level until general degree granting authority at that particular degree level is conferred. In such cases, Committee plus Commission approval is required.

Doctoral Degrees

In seeking prior approval to grant the doctorate, institutions will need to demonstrate an understanding of the distinctive character of doctoral education. This includes demonstrating that an institution possesses a doctoral culture, while maintaining institutional capacity and appropriate systems of educational effectiveness at the highest level of graduate education.

Proposals are required to define the nature and significance of the doctoral degree for the institution, and to provide a comprehensive analysis of institutional capacity to support student learning at this advanced level. The analysis should be presented in the context of institutional capacity and educational effectiveness of existing degree levels. Proposals should use the Standards and CFRs, as listed in the Handbook of Accreditation as a framework for analysis. In light of the Four Standards, the Commission expects that institutions will consider the following issues in proposals seeking prior approval of the doctorate:

Doctoral education should be aligned with institutional purposes and educational objectives. (Standard 1)
An institution engaged at this level is making a conscious commitment to create an institutional culture that is supportive of research and professional practice. It is appropriate for an institution to ask itself how this culture fits within the existing institutional goals and mission.

The objectives of doctoral education have particular implications for core institutional functions. (Standard 2)
Doctoral programs differ substantially from baccalaureate and master’s level programs in the depth and breadth of required study, in the increased demands on student intellectual and creative capacity, and in the goal of developing scholars and practitioners at the highest level. Institutions will need to consider whether or not the program is structured to meet these higher expectations for the degree level by demonstrating how student learning outcomes will be achieved and how support for scholarship and creative activity will be provided for professional development of faculty and students.
Institutions may wish to refer to the Handbook for the Creation of CSU/UC Joint Doctoral Programs located at: www.ucop.edu/acadinit/uccsu/jointdochandbook030502.htm when considering a joint doctoral program with a CSU or UC institution.

The Committee will accept reports such as those that have been filed with the California Postsecondary Education Commission (CPEC) or a system office provided that supplemental information addressing all required elements listed in Section III: Proposal Guidelines and Elements and the considerations in this section are included. Please note that the proposal to WASC should be filed after being approved by CPEC, but can be filed prior to the CSU/UC Joint Graduate Board review. Once the final approval has been granted by the Chancellor of the CSU and the President of UC, then WASC will need verification of that approval before sending out the formal action letter approving the program.

Doctoral education requires specialized resources. (Standard 3) The intellectual interaction between doctoral students and faculty is distinctive and central in doctoral education. Institutions will need to consider whether or not the program has resources of appropriate quality and support in terms of faculty, library and information resources, and organizational support services to meet the requirements of the advanced degree.

Doctoral education requires processes for evaluating educational effectiveness. (Standard 4) Institutions will need to demonstrate that quality assurance systems are aligned with the expectations of a doctoral-level education, and are fully integrated with the existing academic culture.

Joint Degree Programs

Institutions should consult with the WASC staff liaison with questions regarding any proposed joint degree programs and are encouraged to review Commission expectations regarding academic programs and degree requirements by consulting Standard 2 in the Handbook of Accreditation. While the whole Standard and Criteria for Review (CFR) provide a framework for institutional self-evaluation, Criteria for Review 2.1, 2.2, 2.3, and 2.4 provide guidelines that cover content, structure, nomenclature, and expectations for student achievement for baccalaureate and graduate degree programs.

Proposals to offer a joint doctoral degree are typically between a UC campus (with general degree granting authority at the doctoral level) and a CSU campus. In these instances, the CSU campus must submit a substantive change proposal in collaboration with the UC partner. Another example is a joint doctoral degree proposal between an independent institution (with general doctoral degree granting authority) and a CSU campus or another private institution (without the general doctoral degree granting authority). In such cases, Committee and Commission approval are required.
SECTION III: PROPOSAL GUIDELINES AND ELEMENTS

DEVELOPING THE PROPOSAL

This section serves as a guide to assist institutions in developing a substantive change proposal. Consult Section II: Substantive Change Policies for further information on policies affecting proposal content for doctoral degree programs and Systems Review proposals.

Proposals that the Committee has found to be of high quality are:
1) clear and responsive to each element provided in the guidelines below; 2) linked to institutional mission and objectives; 3) supported by evidentiary findings and conclusions, i.e., market analysis; 4) demonstrative of the alignment between program and course learning outcomes; 5) based on planning processes that include key academic faculty, staff, and administration; and 6) illustrative of the financial capacity of the institution to sustain the program, i.e., budget.

Please note that the Substantive Change Committee has requested the right to remove any proposal from its docket if staff feels that the proposal is incomplete, i.e., required sections as defined in the guidelines below are not addressed in the proposal. This preliminary staff review is designed to assist the institution in avoiding Committee denial or deferral based on procedural grounds.

 Consult Section II: Substantive Change Policies for further information on policies affecting proposal content for doctoral degree programs and Systems Review proposals.

A proposal template is provided on the Substantive Change Resources page of the WASC Senior website to assist institutions in organizing their proposals based on the guidelines described below.

GENERAL GUIDELINES FOR ALL SUBSTANTIVE CHANGE PROPOSALS

Guidelines to assist an institution in organizing and developing a substantive change proposal are provided on the following page. These guidelines describe in detail the mandatory sections of the proposal and the elements within each section of the proposal that an institution should address within 20 pages. Institutions proposing online programs should refer to Good Practices for Electronically Offered Degree and Certificate Programs in addition to the following guidelines. Institutions proposing international site-based programs should refer to Principles of Good Practice in Overseas International Education Programs for non-US Nationals in addition to the following guidelines. Both documents are provided on the Substantive Change Resources page of the WASC Senior website.

Institutions proposing online programs should refer to Good Practices for Electronically Offered Degree and Certificate Programs in addition to the following guidelines.

Institutions proposing international site-based programs should refer to Principles of Good Practice in Overseas International Education Programs for non-US Nationals in addition to the following guidelines.
Section 1: Overview/Abstract

In one page or less, the abstract should summarize the nature of the substantive change in terms of the following questions:

- What is the degree or program proposed? Is 50 percent or more of the program being proposed at a new site or in a new modality?
- Where is it being offered?
- What is the initial date of offering?
- What is the projected number of students and what type of student is the program geared for, i.e., adult learners, part-time, or full-time?
- What is the anticipated life of the program, i.e., one-time only or ongoing, and what is the timeframe of courses, i.e., accelerated, weekend, or traditional format?
- What other off-campus and distance education programs are offered at the institution? Does this constitute a significant increase in these kinds of programs? How many other programs of this type are offered?
- Does the Department/School offering the program have prior experience with this type of program, i.e., off-campus or online?

Section 2: Institutional Summary Data Form

This form is available as a downloadable file from the Substantive Change Resources page of the WASC Senior website. The version used for substantive change is an abbreviation of the original form submitted as part of the Annual Report to WASC.

Section 3: Descriptive Background, History, and Context

This section should provide a brief description of the institution. The proposal should indicate the broader institutional context in which the new program or change will exist and connect the anticipated substantive change with institutional mission, purpose, and strategic planning.

International sites should also address the following:

- Alignment of the international program with the US institution’s stated mission, purpose, and educational objectives

Degree level (including joint doctoral degree) changes should also address the following:

- Number and type of degrees currently offered at the degree level being proposed

Section 4: Institutional Accrediting History Relevant to Substantive Change

In order for the proposal to be placed in a useful institutional context, this section should contain a brief summary of the institution’s most recent substantive change history. The summary should include the institutional response to issues noted in prior Commission or Committee action letters or visiting team reports that are relevant to the proposed substantive change.

Section 5: Program Need

The Committee has learned over time that substantive change requests begin with an institutional or program need and rationale that is framed by the institution’s mission and strategic goals. The proposal should provide evidence to support the conclusion that interest in the program is sufficient to sustain it at expected levels. In addition to describing the program need, the following should be included in this section:

- Process and results used to establish the need – please provide a summary of the findings, and not the full study
- Evidence used to support enrollment projections
Section 6: Planning/Approval Process

Describe the process by which key faculty, staff, and administrators considered, reviewed, and approved the change. The following should be addressed in this section:

- A description of the planning and approval process, indicating how faculty and other groups (administrators, trustees, etc.) were involved in the review and approval of the new site or program

- Evidence that the approval process included a review of those issues or elements most important in the evaluation of the program, i.e., capacity, educational effectiveness, etc.

Site changes should also address the following:

- For sites outside the state in which the home campus is located, an institution should provide evidence that any necessary governmental licensure or approval has been attained in that state.

- For international sites, an institution should identify any legal requirements to operate in the country and should demonstrate that all legal authority to operate has been obtained.

Joint doctoral degree programs should also address the following:

- Relationship with partner institution(s) in developing and implementing the proposed joint degree program

- Evidence of approvals at all partnering institutions to include the processes for both grievance/governance and for changes in curriculum and for conducting program reviews

Section 7: Program Description

All program-related changes should address the following elements, which have been categorized as curriculum requirements, schedule/format requirements, and admission requirements.

Curriculum requirements include:

- Philosophy of the program design and how it is linked to the pedagogical methods

- Curricular design of the program—special emphasis should be placed on general education, if a baccalaureate program is offered. Special emphasis should also be placed on requirements definitions and how they will be met, degree nomenclature, and the nature of the research environment, if a doctoral program is proposed.

- Learning outcomes for the proposed program

- Curricular map articulating the alignment between program learning outcomes and course learning outcomes

- A listing of courses, identifying which are required

- Demonstrated alignment of learning outcomes with student learning needs, pedagogical methods and the format of the program

- Process by which syllabi are reviewed and approved to ensure: 1) course learning outcomes are described and are linked to program learning outcomes; 2) materials are current; and 3) pedagogy is appropriate for the modality of the course
Sample syllabi from the first three courses of the program, as well as a capstone course (if required) to include specific learning objectives and learning outcomes of the course.

Any special requirements for graduation

Schedule/format requirements include:

- Description of the cohort or open registration model being used and the provisions for students who have to drop out of the cohort for a period of time

- Minimum attendance/participation requirements and the provisions made for students to make up missed assignments or drop out of the cohort

- Description of how timely and appropriate interactions between students and faculty, and among students will be assured. This is especially relevant for online programs.

- Timeframe of courses, i.e., accelerated, weekend, traditional, etc., – if the course timeframe is abbreviated, an institution must allow adequate time for students to reflect on the material presented in class. Faculty using the accelerated course format should be expected to require pre- and post-course assignments, as appropriate. The Committee will expect course syllabi for accelerated courses to be adjusted accordingly to reflect the pre- and post-course assignments, and the accelerated nature of the curriculum.

- Sample schedule of courses for a full cycle of the program

Admissions requirements include:

- Credit policies, including the number of credits that students may transfer in

- Process for awarding credit for prior learning (applicable only to undergraduate level)

- Residency requirements, if applicable

- Sample brochure or admissions material

International sites should also address the following program-related elements:

- Any special admissions requirements

- English language proficiency requirements for admission and graduation

- Evidence that the admissions and curriculum integrity and oversight are maintained by the WASC-accredited institution

- Whether the program will be taught in English – if the program will be taught in the country’s native language, then please refer to the Substantive Change Resources page of the WASC Senior website for additional guidelines on teaching in a foreign language

- Extent to which the program will be adapted to the local culture

Degree level (including joint doctoral degree) changes should also address the following program-related elements:

- Relationship of the new degree level to the mission of the institution, as well as the relationship to the institution’s strategic and academic plans

- The number, variety, and longevity of other programs at the proposed degree level currently being offered

- Degree completion rates for previous or current joint doctoral programs

- Description of the proposed program at the new degree level
Section 8: Faculty

Proposals should specify the number and type of faculty allocated to support the program in terms of developing curriculum, delivering instruction to students, and evaluating educational effectiveness. The proposal should also address the following:

- Analysis of the impact that the proposed program or change will have on overall faculty workload; including teaching, research, and scholarship

- Information about the balance of full-time and part-time faculty members involved, and how that balance will ensure quality and consistency

- Overview of the key credentials and experience of primary faculty responsible for the program – full vitae are not required

- How off-campus faculty will be oriented to the particular needs of the program and the ethos of the institution

- Preparedness of faculty to support the modality of instruction

*International sites and programs should also address the following:*

- Relationship between host country and home campus personnel

- Oversight of the curriculum, program content, and delivery by the US faculty

- Evidence that the educational program is taught by faculty with appropriate academic preparation and language proficiencies under the direction, review, and responsibility of the US campus faculty

- How quality assurance for the program will be maintained

*Degree level (including joint doctoral degree) changes should also address the following:*

- Additional support for faculty to maintain the new degree level

- Faculty commitment to research and ability to chair dissertation committees

- Faculty background and experience to engage in doctoral-level instruction – for joint doctoral degrees this would include the identification of faculty from all institutions who will be primarily involved in the proposed program

Section 9: Student Support Services

The institution needs to demonstrate that it has assessed student support needs and will provide an appropriate array of support services, including, but not limited to:

- Ongoing academic advising and academic support

*Financial aid advising*

- Career placement services

*Off-campus and distance education programs should also address the following:*

- Evidence that student learning resources and support services off-campus and online are consistent with the learning environment provided at the home campus
Section 10: Library and Electronic Information Resources

This section should include a description of the staffing and instructional services that have been put in place and the library and informational resources that are available to students and faculty in support of the proposed change. The proposal should include the following:

- Access to library systems (local, national, or global), networked CD-ROMs, the Internet, information utilities or service providers, and document delivery services for both faculty and students
- Staff and services available to instruct students and faculty on how to use information resources
- Availability of library staff to answer questions
- Accessibility and reliability of computer support services, i.e., 24-hour help desk for connectivity issues, online help screens or tutorials, toll-free numbers for remote, dial-in access, etc.
- Evaluation of access to and use of print or online library resources (information literacy) incorporated into the curriculum
- Plan for evaluating students’ use of library and information resources in the context of student learning
- Impact on the maintenance of the home institution’s library in terms of library and research support appropriate for the respective degree level of the program, i.e., bachelor’s degree work verses doctoral degree work
- Need for cooperative agreements with other institutions – copies of the agreements should be included as an appendix to the proposal

Section 11: Technology

New programs have implications for the increased use and application of technology. The proposal should describe an institution’s technological capacity to support teaching and learning effectively. The proposal should also demonstrate that the technology used in delivering a program is appropriate for the proposed change.

Modality and site changes should also address the following:

- Description of the laboratories, facilities, equipment, hardware, and software that will be provided to support the courses or programs being offered
- Impact on the information technology infrastructure of the institution, school, department, or organizational unit when off-campus or distance education programs rely on servers or other telecommunication infrastructures in use at the home campus – this should include addressing impact on the internal technical support staff as well as end user, technical and/or application support staff
- Technical expertise required to be admitted to the program and minimum requirements for hardware/software that must be owned or acquired by the student, if any
- Fees or special costs associated with computers or electronic access and communication required for enrollment
- Copyright or site and license agreements that may affect support for faculty and students
Section 12: Physical Resources

Institutions should describe the physical resources provided to support the proposed program(s) and the impact of the proposed change on the physical resource capacity and structure of the institution. This includes, but is not limited to the physical learning environment, i.e., classrooms, study spaces, student support areas.

International sites and programs should also address the following:

- Assurance that fiscal integrity and oversight are maintained by the WASC-accredited institution in the host country

Section 13: Financial Resources

The financial resources section should assess the financial viability and sustainability of the program and should address the following:

- Narrative describing all start-up costs and how the costs will be covered
- Financial impact of the change on the institution, including evidence of the capacity of the institution to absorb start-up costs – if the institution has incurred a deficit in the past three years, then supplemental information describing the financial capacity of the institution to start and sustain the new program(s) is required
- A statement of the minimum number of students necessary to make the program financially viable – the budget should reflect anticipated attrition
- A three-to-five-year budget projection based on the enrollment data in the market analysis

Distance education and off-campus programs should also address the following:

- Evaluation comparing the educational effectiveness of off-campus, accelerated, and distance education programs (including assessments of student learning outcomes, student retention, and student satisfaction)
to ensure comparability to campus-based programs

- If the program is offered on campus or in a traditional format, then it would be appropriate to include a summary of a recent program review to determine if changes have been made to the proposed program.

- Description of how the student’s ability to succeed in off-campus, accelerated, and distance education programs will be addressed and linked to admission and recruiting policies and decisions.

**International sites or programs should also address the following:**

- Evidence that the standard of student learning and achievement in the international program is equivalent to the standard expected of students on the US campus

**New degree level programs should also address the following:**

- Systems of educational effectiveness to ensure that programs being offered at the new degree level will not adversely impact the quality of those currently being offered by the institution

**Section 15: Plan for Teach-Out Provisions**

The institution is required to have a plan for teach-out if the program were to close. This plan should detail how students who begin the program will finish if the institution determines that the program is to be closed.

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**Section 16: Appendices**

Only relevant documents should be provided as appendices, and these should be kept to a minimum.

Any questions about which documents are important to include as appendices for the Committee’s review should be referred to the substantive change program manager.

For program-related changes, syllabi and marketing materials stating that the proposed change is contingent upon WASC approval should be included as an appendix.

**Memorandum of Understanding (MOU)**

Proposals regarding changes in mission or legal status, or the implementation of new programs or sites (including international sites), should include a copy of the signed, final memorandum of understanding or related legal documents. MOUs with all third parties for physical plant, library and computer resources (including external, web-based curriculum design vendors) in final form are to be included with the proposal.

If a signed, final version of the MOU cannot be submitted at the time of the substantive change review date, then the WASC staff liaison will decide whether it is necessary to postpone the review until the MOU is finalized. When appropriate, MOUs should be reviewed by the institution’s legal counsel.
**SPECIFIC GUIDELINES FOR INSTITUTIONAL CHANGE PROPOSALS**

The tone and structure of an institutional change proposal should go beyond that of a program-related proposal. Two types of institutional changes exist: 1) changes in mission or objectives of the institution; and 2) changes in legal status or form of control of the institution. Specific elements to include in the proposal (in addition to the previous guidelines) for both types of changes are described below.

Both types of proposals should be framed by the institutional issues identified in the most recent Commission action letter, and should clearly reflect decisions at the executive levels of the institution. Appendices should include documentation that would help the Committee understand the process in which the change was developed, such as former and proposed mission and/or objectives, summary of discussions with campus constituents (Board of Trustees, Academic Senate, students), strategic plans, and/or financial plans.

*Described below are specific elements to consider when developing a proposal relating to a change in mission:*

- Impact of the proposed change on the direction, focus, planning, organization, and resource allocation of the institution

- Impact on governance, finances, academic programming, faculty qualifications, student learning outcomes, infrastructure (particularly with technology), and relationships with external bodies

- Capacity issues for acquired programs in terms of the plans for redesigning programs, particularly when a graduate school and undergraduate institution merge

- Plans for merging faculty and staff, including faculty compensation issues

- Implications for international off-site programs

- Budget to include evidence that resources for the merger are available and committed to support the change

- Signed legal agreements must be included – institutions are encouraged to review draft legal agreements with their WASC staff liaison, who may determine that the use of WASC legal counsel is necessary. In such cases, the cost of legal counsel will be separately identified and charged to the institution, in addition to the regular substantive change fee.

*Described below are specific elements to consider when developing a proposal relating to a change in legal status or form of control of the institution:*

- Anticipated impact of the strategic change in ownership, sponsorship, and/or affiliation

- Analysis of how the change in legal status or control will affect the institution’s capacity to deliver quality programs, specifically how it will sustain its educational effectiveness

- Appropriate legal documentation that defines and supports the change – include as an appendix to the proposal
SECTION IV: SUBSTANTIVE CHANGE REVIEW PROCEDURES

This section describes the substantive change process from the initial submission of an application to the final action on a proposal.

BASIC GUIDELINES FOR SUBMITTING THE APPLICATION

Submit the Application Three Months Prior to the Anticipated Review Date

Once an institution has determined that it intends to propose a substantive change, the first step is for the ALO to complete an application form located on page 9 of this Manual and send it to the WASC office, preferably three months prior to the date of the Committee review. The ALO will receive a confirming e-mail from the substantive change program manager noting the tentative date of the Committee review within two weeks of the receipt of the application. The submission of an application is the trigger to inform the WASC office that an institution wishes to be tentatively placed on the Committee docket. Submission of the proposal and the associated fee will confirm the date of the Committee review.

Generally, applications are accepted on a first come-first served basis if the proposal is considered to be appropriate for Committee review. Institutions should consult with their WASC staff liaison, when necessary, to determine whether a proposed program or institutional change constitutes a substantive change.

To maintain the quality of the Committee review process, no more than six proposals can be considered per month. The Committee will consider two proposals per institution within the same review month. If the institution wishes to submit additional proposals, special approval is necessary.

BASIC GUIDELINES FOR SUBMITTING THE PROPOSAL

Submit the Proposal One Month Prior to the Anticipated Review Date

The proposal, as well as the associated fee, must be received one month in advance of the tentative review date in order to confirm the calendared date of the review.

The proposal must be submitted to the WASC office one month in advance of the date of the scheduled review by the Committee. For the proposal to be calendared, an application must be on file, signed by the institution’s ALO and president, to ensure that the application is supported by the institution. The proposal, as well as the associated fee, must be received one month in advance of the tentative review date in order to confirm the calendared date of the review. Fees not received by the time of the scheduled Committee review date may cause the review to be postponed to a later month. The substantive change program manager will notify the institution of such a situation one week prior to the scheduled review date.
Internal Review

Before submission, all proposals must go through the appropriate internal institutional approval process. Proposals need to be approved by all internal entities, including the chief academic officer, the curriculum committee, and the faculty senate (where appropriate) before submission. It is also important for the institution to demonstrate that the faculty have been appropriately involved in approving the program, especially those involved in its delivery.

Where a proposed change needs to be approved by the board of trustees at an institution, the Committee would expect that board approval would have been obtained prior to the submission of an application. Should an institution wish to follow an alternative procedure of internal approval, the institution’s WASC staff liaison should be consulted.

In the case of a joint doctoral degree program, it is necessary to seek approval from all entities (as listed previously) at each institution named in the proposal. Also, the respective ALO from each institution must sign the application form to ensure that the proposal is supported by each of the institutions named in the proposal.

Required Elements

For a proposal to be considered complete, all internal approvals must be obtained and all elements in Section III: Proposal Guidelines and Elements must be included. Please note that certain sections are required to be included in the proposal based on the type of substantive change being proposed, so it is important to review Section III carefully. A template has been provided on the Substantive Change Resources page of the WASC Senior website to assist institutions in constructing proposals.

Number of Copies and Page Limits

Please note that nine copies of all degree level and organizational proposals and five copies of all other types of proposals must be submitted to the WASC office. These copies are distributed to Committee members, the WASC staff liaison, and the WASC office files. Institutions submitting degree level and organizational proposals are required to submit nine copies, as opposed to five copies, because the extra four copies are sent to the Commission for review. Additional copies of any proposal may be requested if the Committee believes that Commission review may be necessary. Proposals should be spiral-bound (no binders) and should not exceed 20 pages. Appendices should be placed at the end of the proposal or in a separate volume.

The Review

In preparing for the proposal review, institutions will be interacting with WASC staff, the Substantive Change Committee, and possibly the Commission.

Working with WASC Staff

Each institution has been assigned a WASC staff liaison. The liaison should be consulted when development of a substantive change proposal is being considered. Communication between the WASC staff liaison and the proposal development team is important because it ensures that new program planning is integrated with institutional planning. The WASC staff liaison should also be consulted regarding content-related proposal questions.
All questions regarding the process or procedures outlined in this Substantive Change Manual should be directed to the WASC substantive change program manager who has coordinating responsibilities for all substantive change matters.

Please refer to the WASC staff directory found on the Substantive Change Resources page of the WASC Senior website to obtain contact information for these individuals.

INTERACTING WITH THE COMMITTEE PANEL

Nature of the Committee Panel

The Committee is divided into panels for the review process so that the maximum number of proposals can be reviewed each month. The Committee Panel typically consists of two to three Committee readers, who are assigned to a substantive change proposal. Committee readers are chosen based on their expertise in the subject matter, their regional location, and their affiliation with a private or a public institution. Each proposal is assigned to a “primary reader” on the Committee. This individual facilitates the discussion and is responsible for determining what, if any, major issues need to be addressed with the institutional representatives. Other members may ask follow-up questions pertaining to any element outlined in the proposal, Substantive Change Manual, or Commission Standards. Institutional representatives should be prepared to address all educational effectiveness and capacity issues relating to their proposal.

Preparing for the Committee Review

Institutional representatives can prepare for the Committee discussion by reviewing their proposal and the guidelines suggested for proposal content in Section III: Proposal Guidelines and Elements. The Committee appreciates detailed information regarding: the planning and approval process; involvement of key faculty; support for, and training in, the use of technology, as appropriate; assessment of impact upon the broader institution; articulation of learning outcomes; and/or what an institution has learned from previous or similar programs that have been approved and implemented. While the proposal should include this information, discussing the proposal with the Committee Panel presents an opportunity for the institution to provide additional analysis or interpretation. The Committee is particularly concerned with the institution’s capacity to sustain the quality of the program, site or organization, including plans to evaluate student learning outcomes. The Committee uses a proposal evaluation worksheet to guide its reading of the proposal and questioning of the institutional representatives. This worksheet can be found on the Substantive Change Resources page of the WASC Senior website.
The Conference Call

On the scheduled date of the review, institutional representatives will participate in a conference call with the Committee Panel as well as the WASC staff liaison. The conference call consists of a 30- to 40-minute discussion with the institutional representatives regarding the proposal. The Committee has found it particularly helpful to speak with a small team that represents various levels of institutional responsibility and association with the proposed program. This group may include a representative from the provost’s or dean’s office, the program director, and a key faculty member. Institutions may involve up to five representatives, with fewer rather than more being the norm.

COMMITTEE ACTIONS AND COMMUNICATION WITH THE INSTITUTION

The action of the Committee will be communicated to the ALO by e-mail within a few days of the review date and a more detailed letter explaining the Committee’s action will be sent within a few weeks of the review date. The Committee action may result in the need for an additional institutional response, such as a brief report, site visit, or the submission of a revised proposal. The formal action letter received by the institution from WASC on behalf of the Committee will communicate any expectations for institutional response. The letter will be addressed to the ALO with a copy sent to the president of the institution and the lead member of the institutional team participating in the review, if known.

In some instances, the Committee may identify concerns about an institution’s policies or practices regarding its capacity to offer the proposed program. The Committee may restrict acceptance and approval of all forthcoming substantive change proposals until a focused capacity review by the institution has been submitted. In these cases, the Committee will outline the parameters of the focused capacity review, based on its interactions with the institution.

The Committee also reserves the right to recommend any proposal to be reviewed by the Commission for further analysis if it feels that an additional review is warranted.

Until final approval is attained by the Committee and/or Commission, an institution should proceed with caution when giving notice of new programs to avoid premature declarations. Institutions should state that the program(s) are pending WASC approval in all recruitment and advertising materials.

The chart on the next page labeled “Substantive Change Committee Actions and Next Steps” provides an overview of the possible Committee actions, as well as the institutional and WASC follow-through associated with each action.
### Substantive Change Committee Actions and Next Steps

<table>
<thead>
<tr>
<th>Committee Action</th>
<th>Next Steps for Institution</th>
<th>WASC Next Steps</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Approve</strong></td>
<td>Notify WASC of program or site start-up using the notification form for program implementation.</td>
<td>WASC staff liaison works with ALO to schedule six-month visit for new sites.</td>
</tr>
<tr>
<td></td>
<td>If approval was for an off-campus program, then begin to plan for the six-month visit unless waived.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Complete the institutional evaluation form.</td>
<td></td>
</tr>
<tr>
<td><strong>Defer, with request for additional information</strong></td>
<td>Submit additional report or supplement.</td>
<td>WASC staff liaison reviews report and schedules a follow-up call with the Committee.</td>
</tr>
<tr>
<td></td>
<td>Submit revised proposal if advised by the Committee (fee is required*).</td>
<td></td>
</tr>
<tr>
<td><strong>Deny</strong></td>
<td>Resubmit new application/proposal (fee is required*).</td>
<td>Substantive change program manager schedules Committee review.</td>
</tr>
<tr>
<td></td>
<td>Complete the institutional evaluation form.</td>
<td></td>
</tr>
<tr>
<td><strong>Refer to Commission</strong></td>
<td>Await Commission review</td>
<td>Proposal is placed on February or June Commission docket or Commission Panel conference call scheduled for special circumstances.</td>
</tr>
<tr>
<td></td>
<td>Works with the substantive change program manager in planning and scheduling a site visit, if required, i.e., degree-level changes.</td>
<td>Substantive change program manager works with ALO to plan and schedule visit prior to Commission meeting.</td>
</tr>
<tr>
<td></td>
<td>Complete the institutional evaluation form.</td>
<td></td>
</tr>
</tbody>
</table>

*Refer to website for fee schedule: www.wascweb.org/senior*
WHEN DOES A COMMISSION REVIEW FOLLOW A COMMITTEE REVIEW?

The Commission has determined that its approval is required for certain categories of substantive change. These include those usually associated with changes in degree level or organizational changes. In these cases, the Committee receives and reviews the proposal, interacts with institutional representatives as with program-related substantive changes, requests a site visit, and makes a recommendation to the Commission. The Commission will then review the proposal, team report from the site visit, and the Committee’s recommendation; and then take action.

For planning purposes, it is important to anticipate whether or not a substantive change proposal will need to go to the Commission, as the Commission only meets in February and June. To reiterate, all degree-level changes and all organizational changes (mission, ownership, etc.) must go to the Commission for review. Other substantive changes may need to go to the Commission for review if extenuating circumstances exist and the Committee feels it is necessary for the Commission to review such a proposal.

Please refer to the chart in Section II: Substantive Change Policies that lists all substantive change types and indicates whether Commission review is required.

Please note that institutional representatives do not normally attend the Commission meeting at which substantive change proposals are considered.

WHEN DOES THE COMMITTEE NOT RECOMMEND COMMISSION REVIEW?

For organizational or degree-level changes, the Committee may, in some instances, determine that a proposal is not ready for Commission review. This type of Committee action usually occurs when a site visit (following the Committee review, but prior to Commission review) identifies significant issues and/or lacks evidence in addressing the concerns noted in the Committee’s action letter. In such a case, an institution would be notified by its WASC staff liaison and the following may be requested: 1) an additional report or evidentiary materials; 2) another Committee review; and/or 3) an additional conversation with the institutional representative. If, following the receipt and review of additional information, the proposal is still not ready for Commission review, then the Committee will take an action of deferral or denial.

GUIDELINES FOR DEVELOPING SUPPLEMENTAL REPORTS

A decision about an institution’s proposal may be deferred for more information. An institution may be asked to provide additional information to the Committee to supplement a section that was not fully developed in the proposal or to respond to issues noted in the Substantive Change Committee action letter. Additional reports should be no more than 10 pages in length. They are expected to be analytical and provide evidence that the institution has addressed the capacity or educational effectiveness concerns noted in the action letter. Additional reports are reviewed by WASC staff, as well as Committee members, and are compared to the request for additional information to ensure that all information requested has been included in the report. If the report is found to be complete and the information contained within the report addresses the Committee’s concerns, then
the Committee will take action on the proposal.

Additional information is typically requested in the following areas:

- Financial Resources – Budget Projections
- Educational Effectiveness – Assessment Plan
- Curriculum – Learning Outcomes, Conceptual Design and Faculty Considerations
- Memorandum Of Understanding – Final Signed Copy

A fee may be required for additional reports or supplements. Please consult the WASC website at: www.wascweb.org/senior for the current Schedule of Dues and Fees.

**INSTITUTIONAL RESPONSIBILITIES AFTER RECEIVING AN APPROVAL**

**Notification of Program Implementation**

After an institution obtains approval to implement a program-related change, it must inform WASC of the date the program is to be implemented. This information is necessary for WASC records and should be sent to the substantive change program manager using the notification form for program implementation found on the Substantive Change Resources page of the WASC Senior website. If the substantive change is for an off-campus site, then this form is used as a trigger to schedule the six-month site visit required by the Department of Education. Please refer to Section V: Substantive Change Site Visit Procedures, which describes the site visit requirements and process in detail.

**Evaluation of Substantive Change Process**

The ALO of the institution is also requested to complete an institutional evaluation form so that WASC and the Committee can continuously review and improve the substantive change process. The ALO may elect an institutional representative to complete this form on his or her behalf. The form will be sent to the ALO, along with the action letter, and can be found on the Substantive Change Resources Page of the WASC Senior website.
A site visit is an arrangement whereby a team of Committee and/or institutional peers reviews a proposed new site to: 1) meet with institutional representatives, faculty, and/or students; 2) observe teaching and learning spaces; 3) seek additional information or perspectives; and 4) clarify issues or questions raised by the Committee. In some cases, the site visit may also include the home campus, branch campus and/or regional centers that provide administrative support or oversight of the site.

Three types of site visits exist for substantive change:

1) Six-month visit required by the Department of Education (DOE) for new sites or off-campus programs

DOE regulations require that approved off-campus programs or sites be visited six months following the initiation of the new program or site. DOE also requires a site visit to additional locations if the institution has three or fewer additional locations, has not demonstrated a proven record of effective educational oversight of additional locations, or has been placed on sanction.

The six-month visit requirement is waived for international programs if the institution certifies that students enrolled in programs abroad are not eligible for and will not be seeking US federally funded financial aid.

2) A site visit requested by the Committee to review a substantive change requiring Commission approval – the site visit is to be scheduled before the Commission meeting at which the proposal will be considered

3) A visit requested by the Committee or Commission staff for extenuating circumstances

**THE FEDERALLY MANDATED SIX-MONTH SITE VISIT**

The primary purpose of the six-month federally mandated visit is to verify the adequacy of the physical teaching site, learning resources, and support services.

**PROCESS AND VISIT PROTOCOLS**

**Notification of Site Visit Requirement**

The Committee action letter approving the new site will note that a federally mandated visit is required within six months of the program’s initiation. The institution is responsible for informing the WASC office that an approved site or off-campus program has been started. The ALO is responsible for sending the Notification of Program Implementation Form (found on the Substantive Change Resources page of the WASC Senior website) or a brief e-mail or written memo to the WASC office, to the attention of the substantive change program manager, with a copy to the WASC staff liaison. The substantive change program manager will then contact the ALO to plan and schedule the site visit.
Documentation for the Site Visit

Once the visit is scheduled, the institution will be asked to submit three copies of the original proposal and a brief update (not to exceed five pages) to the WASC office three weeks prior to the date of the visit. In addition, the institution will be asked to send the materials to the assigned team members.

Nature of the Site Visit

Typically, one team member will be sent to the new site for a visit. Depending on the location and type of program, the visit can run from morning to evening, or from the afternoon on day one to the afternoon on day two. If the site offers an evening program, the noon-to-noon format will work best. The team member will interview the on-site coordinator, faculty, and students; she or he will write a brief report (not to exceed five pages) following the visit. Please refer to the team report format guide found on the Substantive Change Resources page of the WASC Senior website.

Report of the Site Visit

The visitor report will be due in the WASC office within three weeks of the visit. The report is reviewed by the WASC staff liaison and retained in the institution’s file. A copy will be sent to the institution for their files, including a letter confirming that the federally mandated visit has been completed. The institution may choose to respond to the report, if desired.

Cost of the Site Visit

The cost of the site visit, plus an administrative fee, is borne by the institution. Please consult the WASC Senior website for the current fee schedule for site visits.

THE SITE VISIT PRIOR TO COMMISSION REVIEW

The primary purpose of a site visit prior to Commission review is to assess how the proposed substantive change will be implemented, to answer questions identified by the Committee, and to determine the overall impact of the change on the institution.

PROCESS AND VISIT PROTOCOLS

Notification of Site Visit Requirement

The Committee action letter will inform the institution about the site visit requirement. The substantive change program manager will contact the ALO to plan and schedule the visit prior to the Commission meeting. The Committee and WASC staff will determine the size and scope of the visiting team and whether the team needs to have its membership augmented with disciplinary experts.

Documentation for the Site Visit

Once the visit is scheduled, the institution will be asked to submit the original proposal and a brief update to the WASC office three to six weeks prior to the scheduled visit. In addition, the institution will be asked to send the materials to the assigned team members.

Nature of the Site Visit

A small team (one-to-three members) will conduct the visit for one or two days. The team members will interview the on-site coordinator and faculty and, where possible, will observe a class of students.
Report of the Site Visit

The team chair will write a brief report (not to exceed five pages) following the visit. Please refer to the team report format guide found on the Substantive Change Resources page of the WASC Senior website. The team report will be due in the WASC office within three weeks of the visit. The report will be read by the WASC staff liaison and a copy will be sent to the institution for comments and for possible factual errors. The report and institutional response will be reviewed by the Substantive Change Committee Panel. The panel will determine if any further information is required and will make a recommendation as to whether the report will go to the Commission. If the report supports a referral to the Commission, then the WASC staff liaison will prepare a briefing paper for the Commission including the team’s report and the proposal. In this instance, the institution will receive a follow-up letter from the Committee confirming that a visit was conducted and that the proposal is being sent to the Commission for review. If the Committee believes that issues raised in the team report are significant, then the Committee will defer the proposal. The WASC staff liaison will then send the institution an action letter detailing the issues of the deferral action resulting from the team report.

Cost of the Site Visit

The cost of the site visit, plus an administrative fee, is borne by the institution. Please consult the WASC Senior website for the current fee schedule for site visits.

The Site Visit for Extenuating Circumstances

This type of site visit will typically follow the process and procedures listed for the site visit prior to Commission review; the process, however, may change depending on the nature of the circumstances surrounding the proposed change or the state of the institution.

Incorporating a Substantive Change Site Visit into the Comprehensive Visit

If an institution is scheduled for a visit by WASC for other accreditation purposes within one year of a substantive change proposal submission, the substantive change site visit will be incorporated into the scheduled visit. The purpose of the review will then be expanded and another evaluator may be added to assess the impact of the change on the institution or site.
SECTION VI: INDEX OF RESOURCES AVAILABLE ON THE WASC SENIOR WEBSITE

Relating the Substantive Change Process to the Accreditation Process
Role of the Substantive Change Committee
Frequently Asked Questions (FAQs)
Committee Member Standards of Ethical Conduct
Conflict of Interest Statement
Commission Policy on Language of Instruction

*Principles of Good Practice in Overseas International Education Programs for non-US Nationals*

*Good Practices for Electronically Offered Degree and Certificate Programs*

**FORMS:**

Substantive Change Application Form
Summary Data Form
Notification Form for Program Implementation
Institutional Evaluation Form

**TOOLS:**

Process Checklist
Proposal Template
Proposal Evaluation Worksheet
Substantive Change Site Visit Team Report Format