

Manual for Programs, Instructional Locations, and Substantive Change:

A Guide to Substantive Change Policies and Procedures

Published by the WASC Senior College and University Commission (WSCUC)

January 2023

©2023 by WASC Senior College and University Commission

Table of Contents

Item	Page
Section I: Substantive Change Policies and Procedures	4
Commonly Asked Questions about Substantive Change	4
Institutions on Sanction	5
Candidate and newly accredited institutions	5
Levels of Substantive Change Review	5
Overview of WSCUC Substantive Change Process	7
Role of Staff, Substantive Change Committee, and the Commission	7
Review of Programs	8
Submission of Programs for Review	8
Non-degree Programs	9
Degree Programs	9
First Degree at a Degree Level	9
Special Requirements for Doctoral degrees	10
Distance Education Programs	11
Institutional Approval for Distance Education	11
Substantive Change Approval for Distance Education Programs	11
Competency Based Education & Direct Assessment Programs	13
Joint Degree and Dual Degree Programs	14
Other Program Reporting and Review Requirements	15
Changes to programs	15
Agreements with Unaccredited Entities	16
Instructional Locations: Additional Locations and Branch Campuses	17
Teach Out Plan Requirements	20
Changes Requiring Structural Change Review	21
First Program at a New Degree Level	21
First Competency-based or Direct Assessment Degree Program	21
Organizational Change: Mission, Legal Status, Ownership, or Control	21
Noncompliance with Substantive Change Policies	24
SECTION II: Substantive Change Review Procedures	25
Step 1: Determine Whether a Change Is Considered Substantive	25
Step 2: Develop the Proposal	26
Step 3: Submit the Proposal	27
Step 4: Participate in the Panel Review	27
Step 5: Review Outcomes	28

Step 6: Host a Site Visit (for Structural Changes)	30
Step 7: Receive Final Approval	31
Resubmission of a Proposal	32
Marketing and Implementation of a New Program	33
Notifying WSCUC of Implementation	33
SECTION III: Substantive Change Site Visits	34
Pre-Implementation Site Visits	34
Post-Implementation Site Visits	35

Section One:

SUBSTANTIVE CHANGE POLICIES AND PROCEDURES

Commonly Asked Questions

What is Substantive Change?

As defined by the WSCUC [Substantive Change Policy](#), a Substantive Change at an accredited or candidate institution is defined as a change to an institution's mission, educational programs, scope, control, or organizational structure that needs to be reported to and approved by WSCUC in advance of implementation.

Why does WSCUC review Substantive Changes?

WSCUC is committed to ensuring high quality and to making certain that any changes in educational programs, delivery modalities, instructional locations, scope of offerings, and control of the institution are in keeping with the [Standards of Accreditation](#). In addition, approval of a Substantive Changes is mandated by the U.S. Department of Education.

How do I determine if a change requires approval?

This manual outlines the policies and procedures for Substantive Change. Institutions must submit a Substantive Change Request for all programs to determine if further review is required. If you are uncertain whether a proposed change requires prior approval, contact the substantive change staff well in advance of implementing the program.

How far in advance of my implementation date should I submit a Substantive Change request?

Institutions are encouraged to submit a Substantive Change Request at least six months prior to the planned implementation date of the change to ensure to provide adequate time for review and approval by the Commission. Requests for programs at a new degree level, Changes of Control, Ownership, Mission, etc. or Competency-based education requiring additional review by the Commission should be requested at least nine months in advance. Institutions are encouraged to plan accordingly because changes requiring approval cannot be implemented until approval is granted.

Who reviews my proposal for a Substantive Change?

Proposals are reviewed by the WSCUC staff and members of the Substantive Change Committee, who are peer evaluators chosen for their experience in higher education. The Committee reviews proposals in panel format and makes recommendations on approval of changes to the Commission. Staff may review changes deemed to be routine additions or alterations to an institution's offerings.

Are there some institutional changes that require review beyond Substantive Change?

In some cases, the Commission may require a comprehensive institutional review, instead of a Substantive Change review or Structural Change review, when it deems that the changes made or proposed at an institution are of such scope or significance that they would change the fundamental nature or character of the institution. Comprehensive reviews include a self-study leading to an institutional report, an off-site review, and an on-site team visit. Changes that may trigger a comprehensive review include, but are not limited to:

1. Rapid growth in new educational programs in any modality
2. Multiple extensive changes to existing educational programs
3. Rapid growth in student enrollments
4. Rapid growth in campuses or off-campus locations for educational program delivery
5. A change of ownership or control combined with a change of mission

Institutions on Sanction

Institutions that are on sanction, have been subject to negative action by the agency over the prior three academic years, or are under a provisional certification, as provided in 34 CFR 668.13 must have prior review and approval for:

- (1) A change in an existing program's method of delivery,
- (2) An aggregate change of 25 percent or more of the clock hours, credit hours, or content of a program since the agency's most recent accreditation review.
- (3) The development of customized pathways or abbreviated or modified courses or programs to—
 - (i) Accommodate and recognize a student's existing knowledge, such as knowledge attained through employment or military service; and
 - (ii) Close competency gaps between demonstrated prior knowledge or competency and the full requirements of a particular course or program.
- (4) Entering into a written arrangement under 34 CFR 668.5 under which an institution or organization not certified to participate in the title IV, HEA programs offers up to 25 percent of one or more of the accredited institution's educational programs.
- (5) New programs or instructional locations.

Institutions on sanction must receive prior approval from WSCUC for new programs and instructional locations.

Candidate and newly accredited institutions

Newly accredited institutions will be required to have all new programs and locations reviewed through their first reaffirmation of accreditation. The requirement may be waived to allow the new institution to follow the same guidelines as other institutions. Institutions with Candidate status will be required to have all new programs reviewed.

Levels of Review for Substantive Changes

In some cases, a Substantive Change proposal may be reviewed by WSCUC staff. In other cases, the proposal is reviewed by the Substantive Change Committee and/or the Structural Change Committee of the Commission. Levels of review are dictated by federal and Commission requirements. All new programs need to submit a Substantive Change Request Form to determine the necessity of a review.

Staff Review: WSCUC staff may review the changes to programs and the addition of new locations or programs under the circumstances below. Staff may recommend referring a review to the Substantive Change Committee if a higher level of review is deemed necessary.

- New non-degree program that represents a significant departure from the institution's current offerings or modality.
- The initiation of a contract with an institution or organization not certified to participate in title IV, HEA programs to deliver between 25% and up to 49% of a new or existing program.

(Such reviews will be completed within 90 days of receipt of complete information or if Commission review is required, within 180 days).

- New additional location at which 50% or more of an educational program is offered
- New branch campus location (after the first branch campus location has been approved by the Substantive Change Committee)
- Routine changes such as the addition of academic program in a discipline closely related to the institution's existing offerings, or a new program that does not require substantial new courses to implement
- Change in program content (typically an increase or decrease of 25% or more)

Committee Review: The Substantive Change Committee reviews new programs or changes involving alterations to delivery methods of existing programs, such as online and off-campus programs, and organizational structure, including:

- The first three programs at any degree level at a minimum
- The first three programs in a new modality at a minimum.
- Programs representing a significant departure from those that were offered when WSCUC last evaluated the institution
- First branch campus location reviewed by WSCUC
- International location offering 50% or more of a program
- Teach-out agreement with another institution if the agreement results in the identification or establishment of a new location.
- Changes of Mission, Ownership, or Form of Control*.

* These types of reviews must be reviewed by the full Structural Change Committee in accordance with a Commission meeting. The Commission meets in February, June and November.

Institutions are reminded to consult with the Substantive Change staff regarding the change being proposed. The staff can confirm the appropriate category of the change and identify any restrictions on or additional requirements for Substantive Change that have been imposed on the institution by the Commission.

OVERVIEW OF WSCUC SUBSTANTIVE CHANGE PROCESS

Roles of Staff, Substantive Change Committee, and the Commission

WSCUC Staff:

The Substantive Change staff carries out the work of the agency under the direction of the Commission. They facilitate the review of Substantive and Structural change proposals, site visits, and commission actions. Staff members conduct preliminary reviews of proposals and facilitate panel reviews with members of the Substantive Change Committee. For certain types of changes involving minor changes, staff may review proposals and take action.

Substantive Change Committee:

The Substantive Change Committee is a WSCUC standing peer review Committee comprised of members chosen for their experience in higher education. The committee convenes in panels to review Substantive Change and Structural Change proposals, conducts site visits, and makes recommendations to the commission. Substantive Changes reviewed by panels of the Committee are referred to Commission or its Executive Committee for action. Structural Changes are referred to the Commission's Structural Change Committee for review prior to final consideration by the Commission.

WSCUC Commission:

Commissioners are nominated and elected by the chief executive officers of WSCUC member institutions in the and serve overlapping three-year terms. The Commission meets twice a year (Feb and June) to act on institutional reviews, including Substantive Changes and Structural Changes. The Commission also convenes a retreat November for orientation and planning during which it may also consider institutional actions.

Structural Change Committee:

One of the standing committees of the Commission. The Committee reviews Structural Change proposals and recommends action to the full commission. It meets in person during the three Commission meetings each year, and in panels by remote meeting as needed.

Executive Committee:

The Executive Committee is comprised of seven or more members, including the chair of each of the other standing committees of the Commission, as well as the Commission Chair and Vice Chair, and one public member. The Executive Committee meets monthly to discuss Commission business and act on Substantive and Structural changes. It may act in lieu of the full commission on certain issues.

REVIEW OF PROGRAMS

Definition: WSCUC defines a program as: a program or series of courses carrying academic credit leading to a credential (degree, diploma, certificate etc.) Programs are classified as non-degree (certificate) or degree level (associate's, bachelor's, master's, professional doctorate, or research doctorate).

Institutions with Candidate or accredited status with WSCUC must request new programs prior to implementation to determine if further review is required.

The addition of new programs may be reviewed and approved by staff when they are determined to be routine changes within the institution's scope of accreditation.

Programs will undergo review by peer evaluators from the Substantive Change Committee for significant but focused changes, such as those that represent a departure from the institution's academic portfolio, or delivery in a modality new to the institution. Reviews for the first program at a new degree level will require a pre-implementation site visit unless waived by the panel. The panel conducting the review will make a recommendation to the Commission for approval, which will make a final determination in accordance with the Substantive Change Policy.

Submission of Programs for Review

The institution's Accreditation Liaison Officer (ALO) will be responsible for submitting Substantive Change Requests for all new programs through WSCUC's Substantive Change process via WSCUC's [Accreditation Management Portal \(AMP\)](#). Requests for new programs should be submitted 6-9 months prior to anticipated implementation to assure a review can be accommodated if required. This is especially needed in a case where a pre-implementation visit may be required.

Institutions will be required to submit the following information for each new program:

- Full name of the program as it will appear in the institution's catalog.
- A brief narrative description of the program to include rationale for the requested change, description of the institution's approval process, and connection to the institution's mission.
- Proposed start date of the change
- Requested month and year of review (if deemed needed by staff)
- Program level (non-degree, associate's, bachelor's, master's, professional or research doctorate)
- Modality of the proposed program (on-site or distance education).
- The two most closely related programs offered at the institution
- Number of new courses being required for the program
- Number of new faculty members required for the program
- Number of units/credits required for completion of the program
- Description of any significant equipment or facilities needed for the program
- Description of any significant financial resources needed
- Description of and significant library or learning resources needed
- Indication of utilization of an Agreement with an Unaccredited Entity for delivery of the program
- Indication of whether the program is a Competency-based program

Non-degree Programs

Non-degree programs are programs or series of courses that carry academic credit and result in a credential other than a degree (certificate, diploma, etc.). New non-degree programs are to be requested by submitting a new program request in the Accreditation Management Portal.

Non-degree programs that are determined to be a routine addition to an institution's offerings, such as those in a discipline closely related to the institution's existing offerings, or one that does not require substantial new courses to implement may be cleared for implementation after submitting the new program substantive change request.

New non-degree programs that are in a new discipline, modality, those that require significant resources to implement, or require review in accordance with the Agreements with Unaccredited Entities Policy will be reviewed and approved by staff. Staff may refer the review to a Substantive Change Committee panel and Commission approval if deemed an appropriate level of review for the request.

Degree Programs

The first three (3) programs at each degree level will require review by a panel of the Substantive Change Committee at a minimum. Programs representing a significant departure from the institution's offerings will undergo a panel review from the Substantive Change Committee. Additional reviews may be required based on the institution's accreditation history, institutional context, or recommendation of staff. The panel will make a recommendation to the Commission which grants approval. Please see Section 2: Substantive Change Review Procedures for an overview of the review process and options available to the Substantive Change Committee panels and the Commission.

Additional programs that are determined to be routine changes and within the institution's scope of accreditation may be cleared for implementation or reviewed by staff based on the institution's accreditation history, institutional context, or recommendation of the institution's VP Staff Liaison.

For new doctoral programs (both professional and research doctorates), please see the Special Requirements for Doctoral Degrees in this manual and the Graduate Program Review Guide.

First Degree at a Degree Level

The first-degree program offered at a level at which the institution does not already offer degrees (associate, bachelor's, master's, professional doctorate, research doctorate) is a structural change, requiring an additional level of review by the Commission's Structural Change Committee. Professional doctorates and research doctorates are considered distinct degree levels.

Institutional requests to offer a program at a new degree level may require a pre-implementation site visit as part of the review and approval process. Joint degree programs are subject to structural change review if the degree level offered is new for one of the institutions.

Special Requirements for Doctoral Degree Programs

The institution must demonstrate an understanding of the distinctive character of doctoral education, support a doctoral culture while maintaining institutional capacity, and sustain appropriate systems of educational effectiveness at the highest level of graduate education.

Proposals must define the nature and significance of the doctoral degree for the institution and provide a comprehensive analysis of institutional capacity to support student learning at this advanced level. The analysis must be presented in the context of institutional capacity and the educational effectiveness of existing degree levels.

Proposals are expected to use the Standards of Accreditation and CFRs, as listed in the Handbook of Accreditation, as a framework for analysis. Considering the four Standards, the Commission expects that institutions will consider the following issues in proposals seeking prior approval of the doctorate:

Doctoral education must 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 mission.

The objectives of doctoral education have particular implications for core institutional functions.

(Standard 2)

Doctoral programs differ substantially from other degree levels in the depth and breadth of required study, in the increased demands on student intellectual and creative capacity, and in the commitment to developing scholars and practitioners at the highest level. Institutions need to consider whether 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 members and students.

Doctoral education requires specialized resources.

(Standard 3)

The intellectual interaction between doctoral students and faculty is distinctive and central in doctoral education. Institutions need to consider whether the program has the faculty, information resources, and organizational support services to meet the requirements of the advanced degree.

Doctoral education requires special processes for evaluating educational effectiveness.

(Standard 4)

Institutions 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.

Also available as a resource is the [Graduate Program Review Guide](#).

Distance Education Programs

Institutional Approval for Distance Education:

Institutions must have WSCUC approval to utilize distance education in the delivery of any of its programs in any amount. Institutions that have at least one approved distance education program will be considered to have Institutional Approval for Distance Education. Those institutions with no approved distance education programs seeking to utilize distance education delivery for any part of a program should consult the Substantive Change staff to seek that approval.

Substantive Change Approval for Distance Education Programs

Institutions must request and obtain substantive change approval for programs in which 50% or more of the program (units for completion of the program) will be offered utilizing distance education. In the context of the Substantive Change review requirement for programs, WSCUC considers a distance education course to be one in which 50% or more of the instruction and interaction occurs using one or more of the technologies included in the definition of distance education, with the faculty and students being physically separate and pertains to the entire set of courses/units a student undertakes to complete the program.

An institution will undergo peer review by a Substantive Change Committee panel for its first three distance education programs, at a minimum. Additional Committee panel reviews may be required based on the institution's accreditation history, institutional context, or recommendation of staff. Institutions should submit a new program request in the Accreditation Management Portal for those programs in which 50% or more of the program will be delivered utilizing distance education.

Definition

Distance Education is defined as:

Education that uses one or more of the technologies listed below to deliver instruction to students who are separated from the instructor or instructors and to support faculty initiated **regular and substantive interaction** between the students and the instructor or instructors, either synchronously or asynchronously. The technologies that may be used to offer distance education include:

- The internet;
- One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband, fiber optic, satellite, or wireless communication devices;
- Audioconference;
- Other media used in a course in conjunction with any of the technologies listed in this definition

For purposes of this definition, substantive interaction is engaging students in teaching, learning, and assessment, consistent with the content under discussion, and also includes at least two of the following:

- (i) Providing direct instruction;*
- (ii) Assessing or providing feedback on a student's coursework;*
- (iii) Providing information or responding to questions about the content of a course or competency;*
- (iv) Facilitating a group discussion regarding the content of a course or competency; or*
- (v) Other instructional activities approved by the institution's or program's accrediting agency.*

An institution ensures regular interaction between a student and an instructor or instructors by, prior to the student's completion of a course or competency -

- (i) Providing the opportunity for substantive interactions with the student on a predictable and scheduled basis commensurate with the length of time and the amount of content in the course or competency; and*
- (ii) Monitoring the student's academic engagement and success and ensuring that an instructor is responsible for promptly and proactively engaging in substantive interaction with the student when needed on the basis of such monitoring, or upon request by the student.*

(Distance education definition adopted from Code of Federal Regulations 34 CFR § 600.2)

Verification of Student Identity and Privacy

In keeping with federal requirements, WSCUC requires institutions that offer distance education to have processes in place through which the institution establishes that each registered student is the same student who participates in and completes the course or program and receives the academic credit. Therefore, the institution must employ methods such as:

- A secure log-in and pass code
- Proctored examinations
- New or other technologies or practices that are effective in verifying student identity

The institution must make clear in writing at the time of enrollment or registration that it uses processes that protect student privacy and must notify students of any additional fees associated with the verification of student identity.

Institutions are expected to have systems in place to protect technology and student information from cyber security intrusions on its own systems and those that may be outsourced.

Academic Engagement

In keeping with federal requirements, WSCUC requires institutions that offer distance education programs to demonstrate “Academic Engagement” and “Faculty-Initiated Regular and Substantive Interaction” as defined by the federal regulations (see Code of Federal Regulations §600.2 Academic Engagement).

Academic Engagement requires active participation by a student in an instructional activity related to the student's course of study that –

- (1) Is defined by the institution in accordance with any applicable requirements of its State or accrediting agency;
- (2) Includes, but is not limited to -
 - (i) Attending a synchronous class, lecture, recitation, or field or laboratory activity, physically or online, where there is an opportunity for interaction between the instructor and students;
 - (ii) Submitting an academic assignment;
 - (iii) Taking an assessment or an exam;
 - (iv) Participating in an interactive tutorial, webinar, or other interactive computer-assisted instruction;
 - (v) Participating in a study group, group project, or an online discussion that is assigned by the institution; or
 - (vi) Interacting with an instructor about academic matters

Competency-Based Education & Direct Assessment Programs

Definition

Competency-Based Education (CBE) and direct assessment programs do not measure student learning in terms of credit hours or clock hours. Instead, they use the assessment of a student's attainment of competencies as the primary means of determining whether the student earns a degree.

Institutions may currently be incorporating elements of competency-based award of credit in which some components of a degree program are satisfied through assessment of competencies. When the assessment of competencies serves as the singular basis for the award of the degree, it meets the definition set by the U.S. Department of Education as a "direct assessment" program. Federal policy requires that the Secretary of Education approve a direct assessment program after WSCUC approval if students will be eligible for title IV funds for the program.

As applied to the WSCUC Substantive Change Policy, a direct assessment program has five main elements:

1. The program is designed and delivered within the framework of the program's defined knowledge, skills, and dispositions (competencies) as demonstrated by students, rather than in terms of prescribed courses.
2. A student may acquire the requisite competencies from multiple sources and at various times other than, or in addition to, the learning experiences provided by the institution. As such, the length of time it takes to demonstrate learning may be different for each student. Time is the variable; learning is the constant.
3. The institution employs assessment strategies that are capable of establishing each student's achievement of each competency at the level of rigor appropriate to the degree being offered. These strategies will be responsive to the complexity of learning and the accumulation and integration of knowledge expected for the degree, such as through capstone projects or portfolios.
4. The institution establishes that the outcomes for the degree are equivalent in scope and rigor to those of recognized degree programs offered in traditional formats at other institutions or in its own course catalog.
5. The institution has well-developed policies that address related WSCUC and/or federal requirements, including credit hour definitions; transcript recording and reporting; the assessment and award of credit for prior learning; the roles of faculty members and other educational professionals; disbursement of financial aid; and tuition charges and refunds.

An institution is expected to seek prior WSCUC approval when 50% or more of the degree program is awarded on the basis of the assessment of student competencies. The first competency-based or direct assessment program at an institution will be reviewed as a structural change. A specific template is provided for these program proposals.

An institutional request to offer its first competency-based or direct assessment degree program is considered a Structural Change, requiring an additional level of review by the Commission's Structural Change Committee. It may require a pre-implementation site visit as part of the review and approval process and may be subject to follow-up site visit or other monitoring after the program launches.

Joint Degree Programs

A joint degree program is one that is offered in partnership between two or more accredited institutions and leads to the award of one degree with both institutions' names on the diploma.

Institutions should submit requests for new Joint Degree programs by completing the new program request in the Accreditation Management Portal. If the joint degree program is also the first-degree program at a specific level for one or more of the institutions, the change is considered structural in nature and will require review by the Structural Change Committee.

If one of the partnering institutions is on sanction with WSCUC, or on provisional status for federal student aid, the program must be approved through the substantive change process. A review by the Substantive Change Committee and a site visit may be necessary during the review of the proposal.

If a WSCUC-accredited institution is planning to offer a joint degree program with an institution accredited by another institutional accrediting agency, prior approval may not be required as long as a) the WSCUC member institution has previously approved programs at the degree level - the program being offered and b) 50% or more of the program is not being offered at a new site (outside of the partnering institutions' campuses) or via distance education.

The proposal for a joint degree program must be jointly developed by the partnering institutions and submitted by the institutional partner that does not have a previous history of delivering programs in a particular modality or academic discipline. In addition, the institution must provide 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.

Institutions should review the [Joint Degrees Policy](#) for WSCUC requirements of these programs.

Dual Degree Programs

A dual degree program is offered collaboratively by two or more institutions and leads to the award of a separate degree from each of the participating institutions.

Dual degree programs require prior approval if:

- The partner institution(s) is not accredited by a USDE-recognized accrediting agency; or
- Either institution is not authorized to offer programs at the requisite degree level without seeking prior substantive change approval.

If the program represents a new degree level for either institution, the change is considered a structural change, which will require Structural Change approval. A site visit may be necessary during the review of the proposed program.

If one of the partnering institutions is on sanction with WSCUC, any new program, including a dual degree program, must be approved through the substantive change process.

Institutions should review the [Dual Degrees Policy](#) for WSCUC requirements of these programs.

Other Program Reporting and Review Requirements

Changing the Name of a Program

Changing the name of an approved program does not require approval unless other significant changes have been made to the curriculum or length of the program. Institutions should submit an edit to the program name in the Accreditation Management Portal. If additional changes have been made to the program and it is unclear whether the program may require substantive change review, please consult the Substantive Change staff.

Changing the Curriculum or Requirements of a Program

The following changes are to be reported through the Accreditation Management Portal.

- Institutions must report changes to the number of credit hours required to complete an academic program. A change of 25% or more to the content of a program, either in a single change or as the sum of aggregate changes, since the most recent reaffirmation review (including Special Visits or reviews related to Notice of Concern, Probation or Show-Cause) will require approval through the Substantive Change process. This includes changes to a program's curriculum (measured by clock or credit hours), learning objectives, competencies or required clinical experiences, and changes in the general education courses required for program completion and not merely the courses within the discipline, program or major. If the changes to credit hours are less than 25%, WSCUC will add the change to its record of the program to satisfy notification requirements. These changes are to be reported through the Accreditation Management Portal.
- The development of customized pathways or abbreviated or modified courses or programs to accommodate a student's existing knowledge (such as from employment or military service) and to close competency gaps between demonstrated prior knowledge and the full requirements of a particular course or program.
- Requests for offering a program as a majority Distance Education program or as a Competency Based Education program should be made using the New Program request.

Change in measurement of student progress in credit or clock hours

An institution that seeking a change in the way the institution it measures student progress in credit or clock hours, including semester, trimester, or quarter-based systems, or using time or non-time-based methods will need approval prior to implementation of the change. Institution's will use a designated template for the change to be reviewed, which will be conducted by staff.

Agreements with Unaccredited Entities

Federal regulations require Substantive Change approval for institutions entering a written arrangement under which an institution or organization not certified to participate in Title IV, HEA programs offers 25% to 49% of one or more of the accredited institution's educational programs. Such an arrangement will require staff review and approval or Substantive Change Committee review and approval prior to implementation. Institutions considering this kind of arrangement should review the [Agreements with Unaccredited Entities Policy](#) and the [Agreements with Unaccredited Entities Guide](#).

Institutions entering into an agreement under 34 CFR 668.5 under which an institution or organization not certified to participate in the title IV, HEA programs offers up to 25 percent of one or more of the accredited institution's educational programs are required to notify WSCUC within 30 days of entering the agreement.

WSCUC will review and decide on approval or denial of an agreement within 90 days of receipt of a materially complete request. If staff determine significant circumstances related to the agreement require review by a Substantive Change Committee panel, a recommendation will be made to the Commission for its consideration within 180 days.

Requests and notifications for these arrangements are made through the Accreditation Management Portal.

Restarting Inactive or Closed Programs

A previously approved program that has ceased enrollments and has not offered admissions for up to two years should be marked as "inactive" in the institution's inventory of programs. Programs that have been inactive more than 2 years should be marked as "closed" and may require substantive change approval to be offered again.

INSTRUCTIONAL LOCATIONS: ADDITIONAL LOCATION OR BRANCH CAMPUS

WSCUC requires prior approval for two types of off-campus sites: additional locations and branch campuses, under circumstances specified below. Proposals to establish a new location must include the following:

- The educational program(s) to be offered
- The projected revenues and expenditures and cash flow
- Description of administrative operation and physical resources

Distance education telecast locations are not considered to be new sites. Telecast locations fall under the distance education category.

Note that the Department of Education requires that WSCUC maintain addresses of all locations geographically separate from the main campus at which 50% or more of at least one educational program (including credentials, certificates, and other non-degree programs carrying academic credit) is offered, regardless of their distance from the main campus. It is the responsibility of every accredited institution to report accurate and current addresses to WSCUC. Institutions must report, as part of the annual report process, locations at which 50% or more of a non-degree program carrying academic credit is offered, regardless of whether a degree program is offered at that location.

Definitions

An **Additional location** is a site that is geographically apart from the main campus where 50% or more of at least one program is offered. This applies to locations within the United States or abroad.

A **Branch Campus** is an expanded off-campus location that may serve as an administrative and support center for Additional locations and as a facility for offering off-campus programs. A specific review for approval of a Branch Campus is required.

To be designated as a branch campus, the location must meet all the following requirements:

- 50% or more of at least one program will be offered at the location
- The location is permanent in nature
- The location has its own faculty and administrative or supervisory organization
- The location has its own budgetary and hiring authority

Review of locations

The first branch campus proposed by an institution is subject to a panel review by the Substantive Change Committee. Additional branch campuses, and all additional locations, will be reviewed by the staff. If, during the review, staff members determine that the proposed location requires additional review, or if an institution's accreditation status has changed (i.e., placed on sanction), a Committee review and an additional fee may be required.

Once an additional location or branch campus is approved with at least one program, an institution may offer any other approved on-site programs at that location without seeking substantive change approval. Institutions may call their off-campus sites branch campuses, satellite centers, extension programs, or whatever else they choose.

Institutions that seek approval of more than four off-campus locations in a year are subject to a staff review. This review could trigger a recommendation to the Commission for a) a Special Visit to assess growth over the past three years, or b) a comprehensive review to assess the institution's ability to maintain high quality in light of its rapid growth.

Location reviews requiring review by staff will typically be completed within 30 days following the receipt of a materially complete proposal. Those locations requiring review by a Substantive Change panel will undergo review with a recommendation made to the Commission for its consideration within 180 days of receipt of a materially complete proposal.

Partnerships with Other Institutions

An institution planning to offer programs with another institution must submit a Memorandum of Understanding (MOU) or comparable document with its proposal that clearly articulates each institution's responsibility for academic and support services. The arrangements must adhere to the [Agreements with Unaccredited Entities Policy](#).

Site Visit Requirement

A site visit may be required within six months after the establishment of new off-campus locations that require substantive change approval. Typically, the first three off-campus sites established by an institution must be visited. The first location in each country outside of the United States must also be visited.

Reopening a Location

If an additional location or branch campus has been closed for more than two years and the institution wishes to reopen it, the site may require substantive change approval.

Moving a Main Campus or Instructional Location

An institution is required to seek WSCUC approval to move either its main campus or a branch campus prior to the change of location. Moves of over 5 miles will be considered as the closing of one location and opening of a new one, and will require a review by staff. Questions addressing teach-out plans and facilities will need to be addressed. The change of location of the main campus must be reported to WSCUC sufficiently in advance for WSCUC staff to review the plans for the move.

No fee is charged for a change of address that does not require review.

Renaming a Location

Changing the name of a site, including the main campus, does not require prior approval. The change must be reported to WSCUC at the time of the change.

Closing a Location

If an institution intends to cease operations entirely or close any location that offers 100% of at least one program, the institution must submit for approval a teach-out plan to its WSCUC staff liaison. For more information, see the [Teach-Out Plans and Agreements Policy](#).

International Location

Plans for international locations at which 50% or more of at least one program will be offered require review by the Substantive Change Committee. The first international location in each country requires a follow-up site visit six months to one year after implementation. Additional locations in a country may require a visit at the review panel's discretion.

TEACH OUT PLAN REQUIREMENTS

Closing a Program

WSCUC does not review or approve teach-out plans for the discontinuation of programs unless the plan includes the closure of a location. Institutions are, however, expected to comply with the [Teach-Out Plans and Agreements Policy](#). Program closures should be reported in the Accreditation Management Portal once students are no longer enrolled in the program.

Closing a Location

If an institution intends to cease operations entirely or close any location that offers 100% of at least one program, the institution must submit for approval a teach-out plan to its WSCUC staff liaison. For more information, see the [Teach-Out Plans and Agreements Policy](#).

Teach-Out Agreement with another Institution

If an institution determines that one or more programs will be taught out and enters into an agreement with another institution to teach-out its programs, the matter must be reviewed by the WSCUC staff liaison prior to implementation. If the partner institution plans to establish a new off-campus location that will operate beyond the terms of the teach-out, the location is also subject to substantive change review. See the [Teach-Out Plans and Agreements Policy](#).

CHANGES REQUIRING STRUCTURAL CHANGE REVIEW

Some changes reach beyond a particular program or location and affect the institution as a whole. These structural changes require the following steps:

- Review by the Substantive Change Committee
- A pre-implementation site visit (unless waived)
- Review by the Structural Change Committee of the Commission
- Approval by the Commission
- Follow-up site visit after implementation (as applicable)

Structural Change reviews take longer to complete than reviews only requiring review by a Substantive Change panel. Institutions should submit the Substantive Change Request nine months to one year before planning to implement the change and allow for at least six months between the proposal due date and final Commission approval. WSCUC may seek external review of the legal and financial arrangements associated with these types of changes to assure the institution will continue to meet WSCUC Standards of Accreditation.

Note that structural changes for the first competency-based direct assessment degree program or for a Change of Mission, Ownership or Control will only be considered by the Structural Change Committee and the full Commission at one of the three in-person Commission meetings each year (February, June and November), unless under exceptional circumstances.

New Degree Level

Initiation of a program(s) at a level at which the institution does not already offer degrees (associate, bachelor's, master's, professional doctorate, research doctorate) is a Structural Change. Requests for degrees at a new level will require a review by a panel of the Structural Change Committee who will make a recommendation to the Commission or its Executive Committee.

First Competency-Based Education or Direct Assessment Degree Program

The first competency-based or direct assessment degree program at an institution is considered a Structural Change and is subject to a pre-implementation site visit as well as a follow-up visit after the program launches.

Change of Mission, Legal Status, Ownership, or Control

Organizational changes involve alteration in mission, legal status, ownership, or control. Because such changes affect the institution in its entirety, they are considered Structural Changes.

- A **Change in Mission** is defined as a significant change to the objectives of the institution.
- A **Change in Legal Status or Form of Control of the institution** is defined as a change in ownership, sponsorship, or affiliation, e.g., a merger with another institution or organization. A change in ownership or control of a parent entity that owns a WSCUC- accredited institution also constitutes a Structural Change.

When an unaccredited institution merges with a WSCUC-accredited institution, accreditation is not automatic. Institutions are strongly encouraged to review the [Levels of Review for Proposed Changes in](#)

[Mission, Legal Status, Ownership, or Control Policy](#) and consult with their WSCUC staff liaison to discuss the process and timeline for a change of this nature. Such changes may be so extensive that they warrant a fuller review because they could result in an entirely new institution. In such cases, WSCUC staff or the Substantive Change Committee could require the institution to undergo a comprehensive review or be reviewed through the Eligibility process. The institution should consult with their WSCUC staff liaison to discuss the process and timeline for a change of this nature.

In accordance with the [Related Entities Policy](#), institutions planning a Change in Ownership or Control involving a **related entity** must respond to the elements listed in the Change in Ownership or Control proposal template and submit the following information:

- An **Acquisition Plan** that shows how the institution, under the new owner, will continue to meet all eligibility requirements and accreditation standards. Also required: relevant filings with the U.S. Securities and Exchange Commission (if applicable). The principals of the acquiring entity must demonstrate the experience and expertise necessary to operate the institution and, if they operate other institutions, full compliance with applicable laws, rules, and regulations.
- A **Description of New Initiatives** that are planned or anticipated for the first year of the new ownership if they could materially affect the mission, plans, and/or operations of the institution (such as restructuring management, increasing enrollment, or adding several new programs or locations). If such changes could be considered substantive (involving change of mission, for example), the change of ownership application must address them.
- A **Description of Finances** showing how the viability of the related entity and the institution could be affected by the change of ownership and how both partners plan to meet upcoming financial needs.
- A completed [Related Entity Certification Form](#). An institution is considered to have a related entity if its governing board shares decision-making responsibility with one or more non-accredited entities concerning functions and operations of finance, planning, governance, budget and approval processes, recruitment, information systems, or employee compensation.

The Commission will protect the confidential nature of all information submitted by institutions or by related entities, except as otherwise required by law.

Required Documents

To conduct its review, WSCUC requires full access to drafts of board-approved documents, as appropriate to each change category, such as:

1. Documents that establish the legal definition and status of both the current and the proposed ownership and governance entities.
2. Documents that describe the relationship between the institution's ownership entity and a) its governing board and b) any other legally related entities, in order to ensure compliance with WSCUC's expectation for an independent and qualified governing board. These would include the bylaws or the equivalent organizing document and a list of the proposed board members with their affiliations and qualifications.
3. If the institution or a related entity of the institution is for-profit, a description of how the proposed ownership will be held (as stock, shares of ownership, or other equity types) and of the

relationship between ownership interest and voting authority on the institution's governing body.

4. A description of how a proposed transfer of ownership or control will impact the exercise of institutional control, authority, and governance.
5. Other documents specified in the current substantive change template for a change of mission/legal status/ownership/control.
6. Documents that describe the rationale for a change of mission and that provide an analysis of the impact of that change on academic structures, faculty and staff members, student body composition, enrollment, outcomes, allocation of resources, and related dimensions of the organization.

WSCUC Classifications for Institutional Types

Postsecondary institutions are generally categorized as public; private nonprofit; or for-profit. Nonprofit institutions have traditionally been formed as nonprofit corporations under the applicable state corporation laws. For-profit institutions have traditionally been formed as for-profit corporations. Recently, with the addition of the limited liability laws, educational entities are being formed as limited liability companies or LLCs. An institution that is formed as an LLC will ordinarily be classified as a for-profit.

However, under limited circumstances, a California LLC may be classified by WSCUC as a nonprofit entity. The criteria for such classification are as follows:

- (1) all of the members/owners of the LLC must have 501(c)(3) status from the IRS or 23701d status from the California Franchise Tax Board;
- (2) the Articles of Organization must (a) prohibit the sale and transfer of any ownership interest to any entity that does not have 501(c)(3) or 23701d tax exempt status and to any individual, and (b) include a charitable dedication clause and dissolution clause, consistent with those required from 501(c)(3) and 23701d organizations;
- (3) the institution must have approval from the State Board of Equalization for an exemption from property taxes; and
- (4) the institution must agree (a) not to sell its assets to or merge into any organization that is not a 501(c)(3) or 23701d organization without the approval of the California Attorney General, and (b) before the institution makes any changes that affect its continuing to meet any of these criteria, to seek approval from WSCUC.

NONCOMPLIANCE WITH SUBSTANTIVE CHANGE POLICIES

Candidate and accredited institutions are responsible for developing internal procedures to ensure compliance with the Commission's substantive change policies and procedures, and to guarantee that new sites or programs or other changes are not initiated without obtaining the necessary approval.

Such off-campus and/or distance education programs or sites are eligible for federal financial aid only if they are recognized and approved through the Commission's process.

If the WSCUC determines that a site or program has been initiated without obtaining the necessary approval, **the institution will be required to cease enrollments at that site or for that program until the Substantive Change approval(s) has been obtained.**

When noncompliance occurs, the president of the institution will be notified and the institution will be required to submit a response with the following information, in addition to the relevant Substantive Change proposal(s), at the time of its review:

- Clarification of the circumstances in which the change was implemented prior to receiving the requisite substantive change approval(s).
- Audit of the institution's off-campus and distance education programs. Additional programs/locations that are found to be in noncompliance must be reported and scheduled for review.
- Identification of the processes in place or to be put in place to ensure that all future programs/locations receive necessary approvals prior to implementation.

After the review of this information, the matter will be forwarded to the Commission to determine if a sanction may be imposed for violation of the institution's responsibilities under Standard One, Institutional Integrity and Transparency (CFR 1.8).

Section Two:

SUBSTANTIVE CHANGE REVIEW PROCEDURES

This section provides detailed information on the Substantive Change proposal development and review process.

STEP 1: Determine Whether a Change Is Considered Substantive

Section I: Substantive Change Policies and Procedures describes in detail the categories and definitions of substantive changes requiring approval before implementation. Determining the type of change is important, as it is the basis for how the institution navigates the Substantive Change process. The institution's Accreditation Liaison Officer (ALO) must submit a Substantive Change request for new programs to determine the level of a review through the [Accreditation Management Portal \(AMP\)](#). Request for programs should be submitted to WSCUC at least six months prior to the anticipated implementation date to ensure adequate time to complete the review and approval process. Changes requiring Structural Change review (e.g. changes of ownership, mergers, new degree levels) should be submitted at least 9 months prior to the desired implementation. Institutions are also encouraged to contact Substantive Change staff for guidance.

Once it is determined that a proposed change requires further review, the Accreditation Liaison Officer (ALO) submits the appropriate fee (see [Dues and Fees Schedule](#)). Reviews are scheduled on a first-come, first-served basis. Receipt of the fee will reserve a place on the Substantive Change Committee's review calendar.

Review Time Frame

It is important to consider the full timeframe for the review process. Note that the proposed change must receive full approval from the Commission before an institution may implement the change. This approval usually occurs within one month of an Interim Approval recommendation from the Substantive Change Committee. This time frame may vary, however, based on the complexity of the proposed change. Structural changes, and those requiring site visits, take longer to complete. The Substantive Change Committee and the Commission meet monthly in person or by conference call to take action on Substantive Changes. Structural Changes for a change of ownership or control or for the first Competency-Based Education Direct Assessment program will only be considered by the Structural Change Committee and the full Commission at one of the three in-person Commission meetings each year (February, June and November), unless under exceptional circumstances.

STEP 2: Develop the Proposal

After submitting the request form and applicable fee, the ALO will receive an email confirmation from WSCUC staff. This email will include:

- The specific proposal template to complete for the type of change being proposed
- Instructions on completing and submitting the proposal
- The proposal due date (typically two months prior to the Substantive Change Committee review date)
- The tentative date of the Substantive Change Committee review

The ALO is responsible for disseminating this information to the institutional representatives drafting the proposal and for reviewing the proposal for completeness and accuracy prior to submission to WSCUC. Several templates have been developed to correspond specifically to each type of Substantive Change. You will be provided the template that you are to use to complete the proposal. Please follow the instructions included in the template and respond to each question.

Proposals may be no longer than 10,000 words, not including attachments. Appendices may be uploaded with the proposal.

All documents must be uploaded through a designated folder in Box.com, an online file sharing and cloud content management service. Institutions must create a free Box.com account for uploading files for WSCUC review. Contact the substantive change staff for more information.

Proposals that panels find to be of high quality are:

- Clearly written and responsive to each question
- Linked to institutional mission and objectives
- Supported by data and evidence, e.g., market analysis
- Show alignment between program and course learning outcomes
- Based on planning processes that include key academic faculty members, staff members, and administrators
- Illustrative of the financial capacity of the institution to sustain the program or location, i.e., have complete and detailed budgets

Internal Review

Before submitting the proposal to WSCUC, the ALO is expected to conduct a thorough review of the entire proposal to ensure that all required elements of the assigned template have been completed, to check for spelling and grammatical errors, and to ensure consistency in formatting.

All proposals must also go through the appropriate internal institutional approval process. Prior to submission, proposals must have obtained all relevant internal approval, for example, from the president or chancellor, the chief academic officer, the curriculum committee, the faculty senate, the governing board, and/or the system office in keeping with the institution's quality assurance processes. The

institution must also demonstrate that faculty members have been appropriately involved in developing and approving the program, especially those who will be responsible for its delivery.

STEP 3: Submit the Proposal

The proposal must be submitted to WSCUC by the due date assigned, typically **60 days in advance of the scheduled review** with the Substantive Change Committee panel. Proposals submitted after the due date may be rescheduled to another month. A cancellation or rescheduling fee will be applied when an institution requests to re-schedule a confirmed review less than 60 days prior to the review date. (Refer to the [Schedule of Dues and Fees](#) for the re-scheduling fee.)

Preliminary Review by WSCUC Staff

Once the proposal is submitted, WSCUC staff members will review the proposal and give the institution the opportunity to provide missing information and to clarify any aspects of the proposal that are not clear. WSCUC staff will send the ALO an email with instructions for submitting additional information. The institution will be given one week to revise the proposal. Upon receipt of the revisions, the proposal will be forwarded to the Substantive Change Committee for review. Note that WSCUC staff, along with the Substantive Change Committee, reserves the right to remove any proposal from its docket if the submission is excessively incomplete. The preliminary review is designed to assist the institution in avoiding a Not Accept action by the Committee.

STEP 4: Participate in the Panel Review

WSCUC staff will send the ALO an email confirming the log-in information (via phone or video conference) and the date and time of the review at approximately one month prior to the call. The ALO is expected to distribute this information to all institutional representatives participating in the call and to submit the names and titles of those individuals to the WSCUC office.

The proposal will be reviewed by a two- or three-person panel drawn from the Substantive Change Committee, or other peer reviewers depending on the complexity of the proposal. The committee is comprised of peers from who are chosen based on their experience in higher education s. Panels will review and assess each proposal using a scoring rubric, prior to the conference call with the institution. The panel uses these preliminary evaluations to guide the discussion with the institution during the conference call.

Each proposal is assigned a first reader on the Substantive Change Committee panel, who facilitates the discussion during the call, although all panel members are likely to ask questions. Institutional representatives are expected to 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 in detail. The Committee panel often asks questions about:

- The planning and approval process
- Involvement of key faculty members
- Support for, and training in, the use of technology (especially for online programs)
- Impact upon the broader institution
- Learning outcomes, assessment plans, and program review

- Student support services
- Financial viability
- Faculty and staff resources and workload

Discussing the proposal with the panel presents an opportunity for the institution to provide additional analysis and interpretation beyond what is presented in the proposal. Of particular interest is the institution's capacity to sustain the quality of the program, site, or organizational change, including plans to assess student learning outcomes in accordance with WSCUC Standards.

During the Review

On the scheduled date of the review, institutional representatives will participate in a 30- to 45- minute discussion by conference or video call with the panel and a WSCUC staff person. The Committee has found it particularly helpful to speak with a faculty and staff of the institution responsible for the proposed change. This group may include the ALO and a representative from the provost's or dean's office, the program director, and a key faculty. Institutions should include five to seven representatives including faculty teaching in the program.

STEP 5: Review Outcomes

Following a review, the panel will take one of the following actions:

1. Interim Approval
2. Defer action pending receipt of additional information
3. Proceed to Site Visit (if applicable)
4. Refer to Commission
5. Not Accept

Interim Approval

Within 10 business days, the WSCUC staff person will prepare a formal action report on behalf of the Committee citing commendations and recommendations from the panel's review. The institution is expected to address recommendations cited in the action report, typically by the time of the next site visit. Progress on recommendations should be addressed in subsequent Substantive Change proposals even if the proposed change is for a different discipline, degree level, or modality, and other WSCUC reviews including Accreditation Visits and Special Visits.

Once a proposal receives Interim Approval from the Substantive Change Committee, it will be forwarded to the Commission for Final Approval. The Commission meets in person three times per year (February, June and November). In other months, the Executive Committee of the Commission meets to take final action on substantive change proposals via a consent agenda. At its discretion, the Executive Committee may pull a proposal from consent agenda for consideration by the full Commission.

In all cases, Final Approval must be granted by the Commission before any proposed change may be implemented. The institution will be notified by email when Final Approval has been granted or denied.

Defer Action

A panel may defer action on a proposal pending receipt of additional information. This option is provided when the panel has identified a few items that are readily available from the institution but are missing from the proposal. Institutions are generally given one to two weeks to provide the information.

Proceed to Site Visit (for Structural Changes)

If the proposed change requires a pre-implementation site visit, the WSCUC staff will send the institution an action letter on behalf of the review panel within 10 days. This letter will outline expectations for the visit process and specify documents the visit team may wish to review in advance of, or at the time of, the site visit, as well as individuals with whom the team may wish to meet. The site visit will be coordinated by WSCUC staff, the ALO, and the visit team.

The review panel for a Change of Ownership or Control, in consultation with WSCUC staff, may require that a confidential email account be made available to specific constituencies on campus (e.g., faculty or staff) in advance of the visit. The account will be used to gather input on narrowly defined issues related specifically to the change under consideration. The action letter from WSCUC staff will outline the requirement for the email account and identify the issues open for comment.

For more information on the site visit, see Section III of this manual.

Refer to Commission (for Structural Changes)

In certain circumstances, the Substantive Change Committee may choose to waive the site visit requirement and refer the proposal to the Commission's Structural Change Committee for review. In such cases, the institution will receive an action letter from the WSCUC staff within 10 days on behalf of the panel outlining next steps.

The Substantive Change Committee panel also reserves the right to recommend that any proposal under consideration be reviewed by the Commission's Structural Change Committee for further analysis if it finds that an additional review is warranted or that it has insufficient information to grant Interim Approval.

Not Accept—Revising a Proposal

A Substantive Change Committee panel may determine that a proposed change is not sufficiently developed or lacks adequate detail to be forwarded to the Commission for approval, in which case the Committee will take a Not Accept action. The institution will receive from WSCUC, on behalf of the review panel, an action letter that specifies the reasons approval was withheld, citing the relevant Criteria for Review in the Standards of Accreditation, the specific issues that need to be addressed in a resubmission, and information on the steps to resubmit the proposal if the institution chooses to do so.

The revised proposal needs only to address the specific issues cited in the action letter and may be no more than 5,000 words in length, not including attachments. The institution has one year to resubmit; after one year, a new proposal must be submitted for consideration.

A resubmission fee is due prior to consideration of the revised proposal. Please consult the current [Schedule of Dues and Fees](#). Upon receipt of the fee, a Box.com folder will be provided to upload the proposal.

Typically, a resubmission is reviewed by the first reader on the review panel and the WSCUC staff by conference call. The institution is generally not invited to participate in the call. However, the panel may request another review by the entire panel and/or the participation of the institution via conference call if it deems these steps to be necessary. The institution is responsible for addressing any requests for additional information or conducting any other follow-up requested.

If the proposal meets the expectations of the review panel, it will be forwarded to the Commission for consideration (or a site visit will be scheduled, if a structural change).

If, following the receipt and review of additional information, the proposal is still not ready for Commission review, the Committee will take a Not Accept action and the institution may be invited to resubmit again.

Appeal of Committee Panel Decisions

If a proposal is not accepted, the institution may choose to ask the panel to reconsider its decision, by way of a written communication sent within 30 days of receiving the committee's decision. The institution's communication should contain well-documented arguments for reconsideration.

The panel that reviewed the institution's proposal will review the request and make a decision within 30 days of receipt of the request. This decision will be communicated promptly to the institution. If the panel does not reverse its initial decision, within 30 days the institution may ask in writing that the Commission's Executive Committee address the matter.

The Executive Committee will consider the request within 60 days of receipt and will communicate its decision promptly. The Executive Committee's decision is final.

STEP 6: Host a Site Visit (for Structural Changes)

If the Substantive Change Committee acts to proceed to a site visit, WSCUC staff will work with the ALO to determine a date for the visit, which typically lasts one day. The visit usually occurs within 30 to 60 days of the panel's decision. The visit will typically be conducted by one or two members of the Substantive Change panel that reviewed the proposal and is designed to gain more detailed information about the proposed change and its impact on the institution. The agenda for the visit may include meetings with faculty members, administrators, students, and others on campus. The ALO will work with the visit team to finalize the agenda and arrange for the visitors' accommodations.

Within three weeks of the visit, the team will submit a visit report to WSCUC, which will be forwarded to the institution for correction of errors of fact. The institution will have one week to respond. The visit team will then review the changes and revise the report as appropriate. At this time, the institution may submit a written response to the visit report which will become part of the review materials for the proposal. The original proposal, the visit report, and the institutional response (if applicable) will be forwarded to the Structural Change Committee for its consideration.

Evaluator expenses and the applicable site visit fee will be charged to the institution. Please refer to the Document Library on the WSCUC website for the current [Schedule of Dues and Fees](#). Note that flight times over eight hours in length or international travel may be booked as business class. See Section III for more information on site visits.

STEP 7: Receive Final Approval

Final Approval must be granted by WSCUC before any proposed change may be implemented. An institution may not begin offering courses for a new program prior to Commission approval. However, if the Structural Change Committee has acted favorably, the institution may advertise and admit students to the program with the disclaimer that the program is "pending WSCUC approval."

The Commission may make one of the following determinations when considering a proposed change:

- A. Approve the change;
- B. Approve the change with conditions;
- C. Defer action pending requested information;
- D. Deny the change;
- E. Require a Special Visit or reporting; or
- F. Require a comprehensive evaluation if the changes significantly affect the institution as a whole and/or pose challenges to its ability to meet WSCUC Standards of Accreditation.

Substantive Changes

Once a proposal receives Interim Approval from the Substantive Change Committee, it will be forwarded to the Commission on a consent agenda for Final Approval. The Commission's Executive Committee meets monthly and considers actions for Substantive Change proposals. The institution will be notified by email when Final Approval has been granted.

Structural Changes

A Structural Change proposal, along with the site visit report, the institution's response (if applicable) and the Substantive Change Committee panel's recommendation, will be reviewed by a panel of the Commission's Structural Change Committee. Institutional representatives do not typically participate in remote or in-person meetings of the Structural Change Committee for its consideration of changes involving new programs, except when requested by the Committee or staff.

The proposal, if approved by the Structural Change Committee, will be forwarded to the Commission for consideration of Final Approval (typically at one of the three in-person meetings each year). The Commission's Executive Committee may consider recommendations on Structural Changes for the first degree at a new level. The Commission typically acts on recommendations of the Structural Change Committee within 30 days and informs the institution by Commission action letter. If the institution chooses to provide a written response to the visit report, the response will be considered by the Structural Change Committee.

Resubmission of a Proposal (if applicable)

If a proposal is not accepted by the Substantive Change Committee panel or Structural Change Committee, the institution may revise its proposal and provide supplementary information over the course of the next year. After one year, it must submit a new proposal for consideration.

Revised proposals are submitted through Box.com and may be no more than 5,000 words in length, not including attachments.

Revised proposals are reviewed by WSCUC staff and one or more members of the panel that examined the original proposal to see if all requests and suggestions in the action letter have been addressed. A conference call with the institution may be necessary.

Requests for revisions may relate to:

- Financial resources and budget projections

- Educational effectiveness, including student learning outcomes, assessment plans, and program reviews
- Curriculum, including sequencing
- Faculty and staffing
- Memorandum of Understanding (the final signed copy is required)

The institution must pay a resubmission fee. Please consult the current [Schedule of Dues and Fees](#).

Marketing and Implementation of a New Program

Institutions may begin recruitment for a program prior to WSCUC approval with the disclaimer that the program is “pending WSCUC approval”. The following timeline provides for what activities may take place during the approval process.

Timeline for Marketing and Implementing New Programs
After Submission of Request (Before review determination made by WSCUC)
Advertise a new program or site, with notice “pending WSCUC approval”
Before Interim Approval (After proposal and fee are received by WSCUC)
Advertise a new program or site, with notice “pending WSCUC approval”
Receive applications for a new program—but not make admit decisions—with notice “pending WSCUC approval”
After Interim Approval
Advertise the program or site, with notice “pending WSCUC approval”
Admit and enroll students, with notice “pending WSCUC approval”
After Final Approval from the Commission
Begin offering courses

Notifying WSCUC of Implementation

Under Standard One, the institution is responsible for notifying WSCUC within 30 days of the implementation of a substantive change. Programs and locations that have gone through review and that have been approved for implementation should be marked as “active” in the Accreditation Management Portal.

Failure to secure WSCUC approval of any new program or instructional location prior to implementation may result in the suspension of the program’s approval, the need to suspend enrollments, and a potential loss of financial aid for students enrolled in the program. Repeated noncompliance with this requirement could lead to a sanction of the institution under Standard One, CFR 1.8.

Institutions typically have two years from the date of WSCUC approval to implement a change. This time frame may be shorter for some structural changes, such as a change of ownership. If the change will be implemented after the approval time frame, contact the WSCUC staff to discuss whether the change will need to be re-submitted for approval.

Section Three:

SUBSTANTIVE CHANGE SITE VISITS

Site visits are required for certain types of substantive changes, based on U.S. Department of Education and WSCUC policies. This section outlines the two types: pre-implementation and post- implementation.

Pre-implementation Site Visits

Pre-implementation site visits are required for most structural changes, including:

- First degree at a new degree level
- First competency-based or direct assessment program
- Change in mission, legal status, ownership, or control

These visits occur after a proposal has been reviewed by the Substantive Change Committee and must be completed before a proposal can receive Interim Approval and be forwarded to the Structural Change Committee.

Purpose and Scope

The primary purpose of a pre-implementation site visit is to assess how a proposed structural change will be implemented, to answer questions identified by the Substantive Change Committee, and to determine the overall impact of the change on the institution.

A review panel for a change of ownership or control, in consultation with the WSCUC staff liaison, may require a confidential email account be made available to specific constituencies on campus (e.g., faculty or staff) in advance of the visit. The account is used to gather input on narrowly defined issues related to the change at hand.

Members of the Substantive Change panel that reviewed the proposal will conduct the visit over one or two days.

Substantive Change site visits are typically narrow in scope and cover issues determined in advance. During a visit, reviewers may:

- Meet with institutional representatives, faculty members, students, and third-party providers
- Observe teaching and learning spaces
- Learn more about the curriculum and assessment plans
- Evaluate the financial and administrative capacity to offer the program
- Seek additional information or perspectives

The visit typically occurs within 30 to 60 days following the Substantive Change Committee review. In some cases, the visit may include instructional locations other than the main campus if needed.

Following the visit, the team will write a brief report, which will be forwarded to the institution for correction of errors of fact. The institution will have one week to respond and may provide a written response to the report that will become part of the review materials. The report will include a recommendation to either a) forward the proposal and all related materials to the Structural Change Committee for review or b) not accept the proposal.

Please refer to the [Structural Change Site Visit Report Template](#) found in the Document Library on the WSCUC website.

Pre-implementation site visits may be waived at the discretion of WSCUC staff or the Substantive Change Committee.

Expenses

Evaluator expenses and a site visit fee will be charged to the institution. Please refer to the WSCUC website for the current [Schedule of Dues and Fees](#). Note that flight times over eight hours in length or international travel may be booked as business class.

Post-implementation Site Visits

Some substantive changes may require post-implementation site visits including:

- **Off-campus sites** (within six months of establishment) 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
- **International programs** (six months to one year after implementation). Visits must be conducted within:
 - Six months, if students enrolled in the program are eligible for, and will seek, U.S. federally funded financial aid
 - One year, if a) the site is an institution's first location in a country (visits may sometimes be waived at the discretion of the Substantive Change Committee) and b) students are not eligible for, or will not seek, U.S. federally funded financial aid
- **Changes in mission, legal status, ownership, or control** (within six months of implementation)
- Visit **requested by the Committee or Commission staff** for extenuating circumstances.

Purpose and Scope

One of the primary purposes of a post-implementation visit is to verify that the new site has the personnel, facilities, and resources described in the substantive change proposal and that they are adequate to support the program(s) being offered. The Committee action letter or report approving the proposal will note that a site visit is required within a specified time period after the implementation of the change and will outline the issues to be evaluated. The institution will inform WSCUC that a change of ownership has been completed or that a program at an approved site or off-campus location has been started. WSCUC staff will then contact the ALO to plan and schedule the visit.

Whenever possible, one or two members of the Substantive Change Committee panel that participated in the proposal review will conduct the site visit, which typically lasts one day.

Following the visit, the team will write a brief report that will be reviewed by the WSCUC staff and forwarded to the institution for correction of errors of fact. If the visit raises questions about compliance with WSCUC Standards or policies, it may be forwarded to the Commission for further action.

Please refer to the [Follow-Up Site Visit Guidelines and Template](#) on the WSCUC website for more information.

Expenses

Evaluator expenses and a site visit fee will be charged to the institution. Please refer to the Document Library on the WSCUC website for the current Schedule of Dues and Fees. Note that flight times over eight hours in length or international travel may be booked as business class.