

**Policy 2102**  
**Substantive Change Reporting Requirements**

**Date of Current Revision: August 2024**

**Responsible Officer: Vice President and Chief of Staff**

**Secondary Responsible Officer: SACSCOC Institutional Accreditation Liaison**

**1. PURPOSE**

The purpose of JMU's substantive change policy and procedure is to ensure all substantive changes, as defined within, are reported to the university's accreditation body, the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), in a timely fashion as required by the SACSCOC [Substantive Change Policy and Procedures](#) document.

The policy defines the requirements, procedures, and processes for coordinating the university's timely and complete notification of substantive changes to SACSCOC.

If there are differences between the most current version of the SACSCOC substantive change policy and this policy, JMU must follow the procedures, including submission deadlines, described by SACSCOC.

**2. AUTHORITY**

The Board of Visitors has been authorized by the Commonwealth of Virginia to govern James Madison University. See Code of Virginia section § 23.1-1600; § 23.1-1301. The board has delegated the authority to manage the university to the president.

**STATE OR FEDERAL STATUTE AND/OR REGULATION**

SACSCOC accredits the university. SACSCOC is recognized by the United States Department of Education as an agency whose accreditation enables its member institutions to seek eligibility to participate in federally funded programs. SACSCOC requires accredited institutions to follow the substantive change procedures of the association. To retain accreditation, the university is required to comply with SACSCOC procedures concerning substantive changes.

This policy is enacted pursuant to the SACSCOC policy [Substantive Change Policy and Procedures](#), revised June 2024.

**3. DEFINITIONS**

**Approval**

An official action by the SACSCOC Board of Trustees that allows an institution to implement a proposed substantive change.

**Dual Academic Award**

A dual academic award is when a student receives instruction at two or more institutions and each institution grants a separate academic award at the same credential level.

**Branch Campus**

An off-campus instructional site/additional location that is geographically apart from an institution's main campus, where instruction is delivered, and is independent of the main campus of an institution. An off-campus instructional site is independent of the main campus if it is permanent; offers courses in educational programs leading to a degree, diploma, certificate, or other for-credit credential; has its own faculty and administrative or supervisory organization; and has its own budgetary and hiring authority.

**Educational Program**

A coherent course of study leading to the awarding of a credential, i.e., a degree, diploma or certificate.

**Implementation Date**

The implementation date is when an institution begins the significant action of a substantial change, which is material, public, and non-reversible. Examples include admitting students to a new program, starting instruction at a new off-campus instructional site, and closing a program.

Documents submitted to SACSCOC for a substantial change will include an *intended* implementation date, which is an institution's forward-looking good faith estimate of when it will begin a substantive change. The implementation date is determined by SACSCOC and depends on the approval timing of the submitted materials.

**Institutional Accreditation Liaison**

A senior administrator who is responsible for ensuring compliance with accreditation requirements, notifying SACSCOC in advance of substantive changes and familiarizing faculty, staff, and students with SACSCOC accrediting policies and procedures, among other responsibilities.

**Institutional Changes**

As delineated by SACSCOC, substantive institutional changes include:

- Acquisition
- Change in Measure of Student Progress to Completion
- Competency-based Education by Course/Credit-based Approach – Institutional-level Approval
- Distance Education – Institutional-level Approval
- Governance Change
- Institution Closure
- Institution Relocation
- Institutional Contingency Teach-out Plan
- Level Change
- Merger/Consolidation
- Mission Change
- Ownership, Means of Control, or Legal Status Change

**Joint Academic Award**

An agreement between two or more institutions to grant a single academic award to a student who has received instruction at those institutions.

**Notification**

A report to SACSCOC of a substantive change to an accredited institution. Notifications do not require an official action by the Board of Trustees prior to implementation.

**Off-campus Instructional Site/Additional Location Changes**

As delineated by SACSCOC, substantive off-campus instructional site changes include:

- Off-campus Instructional Site Definitions and Guidelines
- Off-campus Instructional Site Notification
- Off-campus Instructional Site Approval (including branch campus)
- Off-campus Instructional Site Relocation
- Off-campus Instructional Site Name or Address Change
- Off-campus Instructional Site Closure
- Off-campus Instructional Site Re-open

**Off-Campus Location**

A location that is geographically apart from an institution's sole main campus and where instruction is delivered.

**Program Change**

As delineated by SACSCOC, substantive program changes include:

- Clock-Credit Hour Conversion
- Competency-based Education by Direct Assessment – Approval or Notification
- Cooperative Academic Arrangements Definitions and Guidelines
- Cooperative Academic Arrangement with Title IV Entities
- Cooperative Academic Arrangement with Non-Title IV Entities – Approval or Notification
- Correspondence Education
- Dual Academic Award
- Joint Academic Award with non-SACSCOC Institution(s) or Entity(ies)
- Joint Academic Award with SACSCOC Institution(s)
- Method of Delivery – Approval or Notification
- New Program – Approval or Notification
- Program Closure
- Program Designed for Prior Learning – Approval or Notification
- Program Length Change
- Program Re-open

**Significant Departure**

An educational program that is not closely related to previously approved programs at the institution or site or for the mode of delivery in question. To determine whether a new program is a “significant departure,” SACSCOC suggests considering the following questions:

- What previously approved programs does the institution offer that are closely related to the new program and how are they related?
- Will a significant number of new courses be added to the curriculum?
- Will significant additional equipment or facilities be needed?
- Will significant additional financial resources be needed?

- Will a significant number of new faculty members be required?
- Are faculty members qualified to teach new courses?
- Will significant additional library/learning resources be needed?

### **Submission Deadline**

Date by which a substantive change prospectus, application, and notification must be submitted to SACSCOC. Dates differ based on the required type of SACSCOC review and the intended implementation date of the substantive change.

### **Substantive Change**

A significant modification or expansion of the nature and scope of an accredited institution. Substantive change includes high-impact, high-risk changes and changes that can impact the quality of educational programs and services. There are three types of substantial changes: institutional changes, program changes, and off-campus instructional site changes, as defined in this policy. SACSCOC reserves the right to consider an institutional change, or a group of changes, as constituting a substantive change even if not specifically enumerated in Substantive Change Policy and Procedures.

### **Substantive Change Coordinator**

The substantive change coordinator (SCC) is an employee with the office of Planning, Analytics, and Institutional Research (PAIR) who chairs the SACSCOC working group and reports directly to the institutional accreditation liaison (IAL). The SCC is responsible for coordinating with the IAL and substantive change monitors to identify and report substantive changes to SACSCOC promptly.

### **Substantive Change Monitor**

Substantive change monitors (SCMs) within Academic Affairs are responsible for monitoring their colleges for potential substantial changes and communicating with the SCC as needed.

## **4. APPLICABILITY**

This policy applies to all substantive changes as defined herein. This policy applies to all university members whose unit may be involved in a substantive change, regardless of their division or position.

It applies to all university officers who initiate, review, approve, and/or allocate resources to any substantive changes, including academic and non-academic programs and activities.

The determination of a change as meeting the SACSCOC requirements determines whether the substantive change process must be followed. Any area with planned activity that may constitute a substantive change must comply with the applicable process before implementation.

## **5. POLICY**

As the university pursues structural and programmatic changes, all changes deemed to be “substantive,” as defined herein, must comply with the applicable procedure prior to implementation.

The university will follow SACSCOC substantive change procedures and inform SACSCOC of such changes and proposed changes in accord with those procedures. Regardless of the origination point within the university, all substantive changes must be tracked and reported under this policy.

## **6. PROCEDURES**

### **6.1 Monitoring for Substantive Changes**

- a. The chair of the SACSCOC Working Group will serve as the university substantive change coordinator (SCC). The SCC resides in the office of Planning, Analytics, and Institutional Research (PAIR) and will report directly to the institutional accreditation liaison (IAL).
- b. Each dean within the Division of Academic Affairs will designate an individual from their college to serve as a substantive change monitor (SCM). The provost and vice president for academic affairs will also identify a member of their leadership team to serve in this role. These persons will work with the SCC to remain current on SACSCOC descriptions of possible substantive changes and the general requirements for submission.
- c. The IAL will serve as the SCM for institutional changes.
- d. When an SCM becomes aware of a potential substantive change, the SCM will notify the SCC via email with a brief description of the change, including its tentative implementation date. Within Academic Affairs, this notification should be done in collaboration with the dean.
- e. The SCMs will undertake annual training arranged by the SCC and the IAL.
- f. In addition to annual training, the IAL and/or the SCC will communicate at least twice annually with all SCMs with updates to the SACSCOC Substantive Change Policy and to inquire about any upcoming or planned changes to academic offerings that might qualify as a substantive change.
- g. The SCC will communicate periodically with the associate vice provost for curriculum to ensure timely review of changes to the curriculum (e.g., new programs, program closures) by the SCC and/or IAL.
- h. The SCC will work with the IAL to determine whether a reported change qualifies as a substantive change and will coordinate with the SCMs the submission of necessary information to SACSCOC. See 6.2.b if it is determined the submission is not a substantive change.
- i. The SCC will record the submitted information in the Substantive Change Tracking Database and begin to coordinate with the IAL to determine if the reported change qualifies as a substantive change.

### **6.2 Determining and Documenting Substantive Changes**

- a. The SCC, in coordination with the IAL, will determine if the proposed change meets the standard of a SACSCOC substantive change.

- b. If the proposed change is determined to not be a substantive change, the SCC will prepare a justification for the decision. This justification will be sent to the appropriate dean and remain on file in the office of the SCC and IAL with other accreditation records. The proposed action will remain subject to all other applicable internal and external review and approval processes.
- c. If the proposed action is determined to be a substantive change, the SCC will notify the appropriate SCM of the decision. The SCC will provide information on the materials necessary for submission to SACSCOC and the required timeline for preparation of materials prior to implementation.
- d. If the IAL and SCC are uncertain whether a proposed action is a substantive change, the IAL will communicate with SACSCOC staff or the institution's assigned SACSCOC vice president.

Note: Communication with the SACSCOC vice president must originate from the president or SACSCOC IAL only.

### **6.3 Preparing Substantive Change Materials for Submission**

- a. The SCC will oversee preparation of submission materials for SACSCOC, in coordination with the SCM and/or other necessary faculty/staff (e.g., the academic unit head) for the academic unit submitting the change.
- b. The areas involved in the substantive change must provide all required information to SCC as requested in order to meet the timeline for submission.
- c. The SCC will follow the applicable procedure and instructions published online in the [Substantive Change Policy and Procedures](#) document to prepare the submission materials.
- d. The SCC will report the progress of the submission throughout the process to the IAL, who will communicate as necessary with the president and/or vice president and chief of staff.
- e. When a substantive change approval requires the submission of a prospectus, the IAL will confer with the office of the provost about conducting a final review of the prospectus prior to submission. The office of the provost is not required to provide a final review of the prospectus prior to the IAL submitting materials to SACSCOC.

### **6.4 Submitting Substantive Change Materials to SACSCOC**

- a. When submission materials are prepared, the SCC will send them to the IAL with a request to submit them to SACSCOC.
- b. The IAL will send the SCC confirmation of submission when it is received from SACSCOC; the SCC will confirm with the SCM the materials have been submitted.

- c. The SCC will update the Substantive Change Tracking Database with confirmation of receipt and any other SACSCOC correspondence received in relation to the substantive change.

## **7. RESPONSIBILITIES**

### **Institutional Accreditation Liaison (IAL)**

The IAL coordinates with the SCC to ensure appropriate review, submission and documentation of substantive changes.

### **Substantive Change Coordinator (SCC)**

The SCC is responsible for ensuring compliance with the SACSCOC and JMU policies related to substantive change, which includes remaining up to date on changes to the SACSCOC policy and ensuring that the institution policy remains accurate. The SCC also works with the Substantive Change Monitors to ensure that they have the latest guidelines needed to identify substantive changes in their divisions.

### **Substantive Change Monitors (SCMs)**

SCMs within Academic Affairs are responsible for monitoring their colleges for potential substantial changes and communicating with the SCC as needed. SCMs must remain current on SACSCOC substantive change regulations that may affect their divisions.

### **Academic Affairs Deans**

Deans within Academic Affairs are responsible for naming an SCM for their college and for ensuring that those involved in the substantive change process within their areas provide the appropriate materials in a timely fashion.

### **President**

The president, along with the IAL, is responsible for the accuracy of all information submitted to SACSCOC and for ensuring ongoing compliance with SACSCOC standards, policies, and procedures beyond reaffirmation.

All departments, offices, and employees that generate, receive, or maintain public records under the terms of this policy are also responsible for compliance with Policy [1109](#) - Records Management

## **8. SANCTIONS**

Sanctions will be commensurate with the severity and/or frequency of the offense and may include termination of employment.

## **9. EXCLUSIONS**

None

## **10. INTERPRETATION**

The authority to interpret this policy rests with the president and is generally delegated to the vice president and chief of staff.

**Previous version:** June 2022

**Approved by the president:** April 2012