

Substantive Changes: SACSCOC Notification and Approval Requirements

Reason for Policy

A “Substantive Change” refers to a significant modification or expansion in the nature and scope of an accredited institution. The federal government mandates that accrediting agencies implement a Substantive Change policy and monitor their member colleges and universities for compliance.

Clark Atlanta University's accrediting agency, the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), requires member institutions to notify SACSCOC of Substantive Changes. In certain cases, institutions must seek SACSCOC approval before implementing these changes as a condition of their accreditation.

Policy Statement

The purpose of this policy is to outline Clark Atlanta University's responsibilities and procedures for promptly notifying SACSCOC of substantive changes. This policy adheres to the [SACSCOC Principles of Accreditation: Foundation for Quality Enhancement](#) and the [SACSCOC Substantive Change for SACSCOC Accredited Institutions Policy](#) in adherence with the [United States Department of Education Regulation 34 CFR 602.22 Substantive Change](#) and the [Clark Atlanta University's Faculty Handbook](#)

Context Statement

This policy applies to any responsible University employee who can initiate, review, or approve changes that are considered substantive according to the current version of the SACSCOC Substantive Change Policy and Procedures. In academic affairs, this includes faculty, assistant and associate deans, deans, vice provosts, and the provost. Other University officials in Procurement and Business Services, the Office of Legal Affairs may be asked to review or approve a Substantive Change initiative. These individuals are responsible for timely notification of Substantive Changes to the SACSCOC Liaison, who is responsible for notifying or seeking approval from SACSCOC as appropriate for the Substantive Change.

Policy Terms Substantive Change

A Substantive Change is a significant modification or expansion of the nature and scope of an accredited institution. Substantive Changes, including those required by federal regulations, include:

- Substantially changing the established mission or objectives of an institution or its programs.
- Changing the legal status, form of control, or ownership of an institution.
- Changing the governance of an institution.
- Merging/consolidating two or more institutions or entities.
- Acquiring another institution or any program or location of another institution.
- Relocating an institution or an off-campus instructional site of an institution (including relocating a branch campus).
- Offering courses or programs at a higher or lower degree level than currently authorized.
- Adding graduate programs at an institution previously offering only undergraduate programs (including degrees, diplomas, certificates, and other for-credit credentials).
- Changing the way an institution measures student progress, whether in clock hours or credit-hours; semesters, trimesters, or quarters; or time-based or non-time-based methods or measures.
- Adding a program that is a significant departure from the existing programs, or method of delivery, from those offered when the institution was last evaluated.
- Initiating programs by distance education or correspondence courses.
- Adding an additional method of delivery to a currently offered program.
- Entering into a cooperative academic arrangement.
- Entering into a written arrangement under 34 C.F.R. § 668.5 under which an institution or organization not certified to participate in the Title IV Higher Education Act (HEA) programs offers less than 25% (notification) or 25-50% (approval) of one or more of the accredited institution's educational programs.

- An agreement offering more than 50% of one or more of an institution's programs is prohibited by federal regulation.
- Substantially increasing or decreasing the number of clock hours or credit hours awarded or competencies demonstrated, or an increase in the level of credential awarded, for successful completion of one or more programs.
- Adding competency-based education programs.
- Adding each competency-based education program by direct assessment.
- Adding programs with completion pathways that recognize and accommodate a student's prior or existing knowledge or competency.
- Awarding dual or joint academic awards.
- Re-opening a previously closed program or off-campus instructional site.
- Adding a new off-campus instructional site/additional location including a branch campus.
- Adding a permanent location at a site at which an institution is conducting a teach-out program for students of another institution that has ceased operating before all students have completed their program of study.
- Closing an institution, a program, a method of delivery, an off-campus instructional site, or a program at an off-campus instructional site.

Procedures

Internal Reporting to Clark Atlanta University's SACSCOC Accreditation Liaison

Reporting Proposed Changes to SACSCOC

Upon becoming aware of a proposed change that may be substantive, responsible parties should notify the SACSCOC Accreditation Liaison as early as possible so that the information required by SACSCOC is prepared appropriately by the University and submitted by the SACSCOC Accreditation Liaison to SACSCOC according to the SACSCOC specified timeline with the appropriate internal review and approvals.

Substantive Change Types

This resource provides a brief overview and is not meant to replace a thorough review and comprehension of the full policy. By summarizing selected details, it offers a quick way to identify and compare various types of substantive changes.

For a substantive change requiring approval by the full Board of Trustees (which biannually), to be implemented after the date of the Board meeting, the submission deadlines are:

- March 15 for review at the Board's biannual meeting in June of the same calendar year, and
- September 1 for review at the Board's biannual meeting in December of the same calendar year

For a substantive change requiring approval the Executive Council of the Board of Trustees (which meets year-round), the submission deadlines are:

- January 1 for change to be implemented July 1 through December 31 of the same calendar year (*internal submission is October 15*), and
- July 1 for change to be implemented January 1 through June 30 of the subsequent calendar year (*internal submission is April 15*).

Substantive Change Type	Requires			Visit		Other	
	Notification	Approval – Exec Council	Approval – Full Board	Contingent	Required	Review Fee	Sub Change Restriction
<i>This is a summary only. Always consult policy for complete information of substantive change types.</i>							
INSTITUTIONAL CHANGES							
Acquisition	●		●		●	●	
Change Measure Progress to Completion		●				●	
CBE Course-Credit Approach-Institutional Approval		●				●	
Distance Ed-Institutional-level Approval		●				●	
Governance Change	●		●		●	●	
Institution Closure		●					
Institution Relocation		●				●	
Institutional Contingency Teach-out		●					
Level Change ^(a)			●		●	●	
Merger / Consolidation	●		●		●	●	
Mission Change		●				●	
Ownership, Means of Control, or Legal Status Change	●		●		●	●	
Prison Education Program – Institutional-level Approval		●			●	●	
PROGRAM CHANGES							
Clock-Credit Hour Conversion		●					
CBE Direct Assessment-Approval			●		●	●	
CBE Direct Assessment-Notification	●						
Coop Acad Arr Title IV Entities	●						
Coop Acad Arr Non-Title IV Entities-Approval		●				●	●
Coop Acad Arr Non-Title IV Entities-Notification	●						●
Correspondence Education		●				●	
Dual Academic Award	●						
Joint Academic Award with Non-SACSCOC Accredited Institution(s) or Entity(ies)		●				●	
Joint Academic Award with SACSCOC Institution(s)	●						
Method of Delivery-Approval		●					●
Method of Delivery-Notification	●						●



Substantive Change Type	Requires			Visit		Other	
	Notification	Approval – Exec Council	Approval – Full Board	Contingent	Required	Review Fee	Sub Change Restriction
<i>This is a summary only. Always consult policy for complete information of substantive change types.</i>							
New Program-Approval		●				●	●
New Program-Notification	●						●
Program Closure		●					
Program Designed for Prior Learning-Approval		●				●	●
Program Designed for Prior Learning-Notification	●						●
Program Length Change		●				●	●
Program Re-open	●						
OFF-CAMPUS INSTRUCTIONAL SITE (OCIS) CHANGES							
OCIS Notification	●						
OCIS Approval Extensive Review			●	●		●	●
OCIS Approval Limited Review		●		●		●	●
OCIS Relocation - Non-Branch	●						
OCIS Relocation - Branch		●				●	
OCIS Name or Address Change	●						
OCIS Closure		●					
OCIS Re-open	●						
OTHER CHANGES							
Implementation Extension		●					

Clark Atlanta University Substantive Change Responsibilities and Procedures

Responsibilities

Clark Atlanta University SACSCOC Accreditation Liaison

Every SACSCOC member institution has an Accreditation Liaison whose charge is to ensure that compliance with SACSCOC accreditation requirements is incorporated into the planning and evaluation process of the institution. The SACSCOC Liaison is responsible for ensuring the University policy complies with the current version of the SACSCOC policy. The SACSCOC Liaison is also responsible for communicating policy updates to University stakeholders.

The SACSCOC Accreditation Liaison for Clark Atlanta University is:

Dr. Lauren V. Lopez

Vice President for Planning, Accreditation, and Institutional Research

LLopez@CAU.EDU

404-971-1593

Responsible Party

Each individual, position, or entity designated within the scope of this policy is required to be familiar with and comply with this policy.

Enforcement

Consequences of noncompliance are articulated in the SACSCOC Substantive Change Policy and Procedures at <https://sacscoc.org/accrediting-standards/substantive-changes/>

The different types of substantive changes, specific procedure to be used for each, the respective notification requirements, and the reporting time lines are included in the table **SACSCOC Liaison**.

The SACSCOC Liaison at Clark Atlanta University is responsible for ensuring compliance with accreditation and substantive change standards as outlined by the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC). The Liaison monitors updates to SACSCOC policies and informs senior leadership of any developments that impact campus operations or decision-making. Specific responsibilities include:

- Developing and annually reviewing the University's substantive change policy to ensure alignment with SACSCOC standards.
- Disseminating substantive change procedures to campus stakeholders.
- Consulting with campus units to evaluate whether proposed changes meet substantive criteria.
- Communicating with SACSCOC staff for policy interpretation and guidance.
- Coordinating the preparation and submission of substantive change notifications, prospectuses, and monitoring reports.
- Maintaining comprehensive historical records of Clark Atlanta University's substantive change submissions and outcomes.

Campus Administrators

Substantive changes may occur across all levels of the institution, requiring administrators to familiarize themselves with SACSCOC categories and definitions of substantive change. Campus administrators are expected to consult the SACSCOC Liaison early during policy or procedural changes to determine reporting or approval requirements. Responsibilities include:

- Developing a working knowledge of SACSCOC policies and CAU's substantive change policy.
- Consulting with the SACSCOC Liaison during the development of new policies or procedures.
- Providing necessary data and planning information for substantive change submissions.
- Engaging with on-site review teams as required.
- Ensuring that unit policies and procedures align with SACSCOC directives and proposing updates to improve policy implementation efficiency.

Office of Planning, Accreditation, and Institutional Research (OPAR)

The Office of Institutional Research serves as the central repository for all substantive change documentation and policy updates. Responsibilities include:

- Providing data for the evaluation of potential substantive changes and the preparation of notifications and prospectuses.
- Publishing and updating the substantive change policy on the University's website.
- Archiving prior submissions and corresponding SACSCOC responses.

Internal Review Procedures

1. **Unit Actions:** Units contemplating changes that may constitute substantive departures must consult the SACSCOC Liaison promptly. The consultation should include written communication detailing the change,

responsible unit and administrator, rationale, audience served, proposed timeline, and any relevant historical context.

2. **Liaison Actions:** The SACSCOC Liaison will review proposed changes and provide a timely response, including:
 - Determination of SACSCOC reporting requirements.
 - Request for additional details, if necessary.
 - Confirmation or amendment of implementation timelines.
 - Suggestions for revisions to ensure compliance.
 - Provision of relevant SACSCOC guidelines and procedures.
3. **Executive Administration Actions:** Substantive changes requiring Board of Trustees, President, or Executive Cabinet approval must secure the necessary endorsements before submission to SACSCOC. Only the President and the SACSCOC Liaison are authorized to submit substantive change documentation on behalf of the University.