

**PALO ALTO COLLEGE  
COLLEGE PROCEDURE**

Procedure Number: A 14.0  
Procedure Title: Reporting Substantive Change  
Relevant Board/SACSCOC Policy: [E.2.1 Accreditation and Substantive Change](#)  
[E.2.1.1 Substantive Change](#)  
Principle 14.2 Substantive Change  
Originating Unit: Vice President of Academic Success  
Maintenance Unit: Vice President of Academic Success and  
SACSCOC Accreditation Liaison

I. Purpose: This procedure provides guidelines to ensure ongoing compliance with Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) Comprehensive Standard 14.2 (<http://www.sacscoc.org/pdf/2018PrinciplesOfAcreditation.pdf>), and follows the guidelines provided by the *Substantive Change for SACSCOC Accredited Institutions* policy statement (<https://sacscoc.org/app/uploads/2019/08/SubstantiveChange.pdf>).

II. Procedure Statement:

- A. The 2022/03/20 SACSCOC Substantive Change Policy Statement defines substantive change as a significant modification or expansion of the nature and scope of an accredited institution. Under federal regulations, substantive change includes various changes with the following categories:
- a. Institutional Changes
  - b. Program Changes
  - c. Off-campus Instructional Site (OCIS) Changes
- B. Detailed types of substantive change, timelines, review processes, submission documents, as well as updates to SACSCOC’s Substantive Change Policy and Procedures may be found in the substantive change policy and procedures: [SubstantiveChange.pdf \(sacscoc.org\)](#)
- C. PAC reported substantive changes typically include:
- Adding a new off-campus instructional site/additional location including a branch campus.
  - Offering courses or programs at a higher or lower degree level than currently authorized.
  - Adding an additional method of delivery to a currently offered program.
  - Closing an institution, a program, a method of delivery, an off-campus instructional site, or a program at an off-campus instructional site.

Additional types of substantive changes, such as initiating dual credit programs, are included in the SACSCOC policy [and procedure]. Some types of substantive change require only prior notification to SACSCOC whereas others require both SACSCOC

notification and approval prior to implementation. See the SACSCOC procedure for full details and instructions.

- D. Twice each year, once during the last two weeks of October and again during the last two weeks of March, and more often as needed, the College Accreditation Liaison will meet with the Substantive Change Review Committee (SCRC), consisting of the Accreditation Liaison, the college Vice Presidents, Deans, Chairs, and Directors, to review all current SACSCOC substantive change policies. At this time the college procedure will also be reviewed to ensure alignment with current SACSCOC substantive change policies. Finally, the SCRC will review all existing and pending substantive change actions to confirm that all SACSCOC requirements will be met.

During each of these meetings the Vice President of Academic Success (VPAS), Vice President of Student Success (VPSS), and Vice President of College Services (VPCS) will provide the SCRC with a summary of the substantive change documents that are currently being prepared and those that may be required during the next 12 months. The SCRC will, in their review of the current substantive change policy, confirm that all required responses to SACSCOC have been addressed. Each college VP will be responsible for substantive change responses required by changes within their respective areas.

As an additional review for offsite locations the VPAS and VPSS (or their designees), will provide to the SCRC the complete schedule of program and course offerings planned for the next 12 months at the off-site locations for which they have programming responsibilities. The committee will review these schedules for substantive change implications.

If the schedules do not trigger a required response to SACSCOC for substantive change, the Accreditation Liaison and SCRC will acknowledge and approve the schedules. If a response to SACSCOC for substantive change is needed, the VP responsible for programming at that offsite location will lead that response. The VP will work with the Accreditation Liaison to create the timeline for creation and submission of the required documents.

If a schedule of programs and courses should change after this review, the VP responsible for programming at that offsite location will notify the Accreditation Liaison, who will re-convene the SCRC. The SCRC will review the new proposed schedule for substantive change implications and if a response is indicated, the VP for that location will, in collaboration with the Accreditation Liaison, prepare and submit that response.

Substantive change responses will be led by the appropriate VP but the required documents will be the product of cross-college collaboration and contribution.

The President shall receive from the Accreditation Liaison, in November and again in April, a summary of all existing and anticipated substantive responses

The college approval process for the substantive change submissions shall include the steps listed in one of the five categories listed below, depending upon the nature of the substantive change. *These categories shall be reviewed and modified each year, or more often if needed, to ensure alignment with the current SACSCOC Substantive Change Policy Statement.*

**Category A. If approval by SACSCOC is required prior to implementation:**

1. The relevant Dean and VP will coordinate the preparation of the prospectus, following the current guidelines and template provided by SACSCOC.
2. The draft prospectus will be forwarded to the Accreditation Liaison (and others at the college as may be deemed appropriate in each case) for review and approval.
3. Upon approval by the Accreditation Liaison, the prospectus will be forwarded to the Institutional Effectiveness (IE) Council for review and approval. A special meeting of the Council will be called if necessary to meet the deadlines established for submission to SACSCOC.
4. Upon approval by the IE Council, the prospectus will be forwarded to the President for review and approval.
5. The President will provide the Chancellor with a copy of the prospectus.
6. Upon approval by the Chancellor (or the Chancellor's designee), the prospectus will be sent to the President of SACSCOC, following SACSCOC current requirements for method of submission. Copies will be provided to the President's office, the Accreditation Liaison, and the relevant VP and Dean.

**Category B. If only notification of SACSCOC is required prior to implementation:**

1. The relevant Chair or Director, working with his or her Dean and VP, will draft the letter of notification to President of SACSCOC.
2. The draft will be forwarded to the Accreditation Liaison for review and approval.
3. Upon approval by the Accreditation Liaison, the letter of notification will be forwarded to the IE Council for review and approval. A special meeting of the Council will be called if necessary to meet the deadlines established for submission to SACSCOC.
4. Upon approval by the IE Council, the letter of notification will be forwarded to the President for review and approval.
5. The President will provide the Chancellor with a copy of the letter of notification.
6. Upon approval by the Chancellor (or the Chancellor's designee), the letter of notification, signed by the President, will be sent to the President of SACSCOC. Copies will be provided to the President's office, the Accreditation Liaison, and the relevant VP, Dean, and Director or Chair.

**Category C. If an approved teach-out plan is required prior to implementation:  
Closing a Program, Instructional Site, Branch Campus or an Institution**

The 2021 SACSCOC *Substantive Change Policy Statement* provides the following information regarding teach-out plans:

*In accordance with Federal regulations and Procedure Three within the SACSCOC Policy on Substantive Change, an institution is required to submit a teach-out plan to SACSCOC for approval if any of the following occurs:*

- 1. The U.S. Department of Education (USDOE) notifies the Commission that it has initiated an emergency action against an institution or an action to limit, suspend, or terminate an institution participating in any Title IV, Higher Education Act (HEA) program.*
- 2. The Commission terminates accreditation or candidacy.*
- 3. The institution notifies the Commission that it intends to cease operations entirely or close a location that provides at least 50% of at least one program.*
- 4. A State Licensing or authorizing agency notifies the Commission that an institution's license or legal authorization to provide an educational program has been or will be revoked.*

*If an institution decides to close an educational program, approved instructional site, branch campus, or the entire institution, it must submit to SACSCOC a teach-out plan for approval. If the plan includes teach-out agreements, then the agreements must also be approved prior to implementation.*

*Teach-out plans and teach-out agreements must be approved by SACSCOC prior to implementation.*

**College response:**

1. After notification of and approval from the president of the college, the relevant Dean(s) and VPAS will coordinate the preparation of the teach-out plan and all associated documents, following the current guidelines provided by SACSCOC.
2. The draft teach-out plan with documents will be forwarded to the VPSS for review and approval.
3. Upon approval by the VPSS, the draft plan with documents will be forwarded to the Accreditation Liaison (and others at the college as may be deemed appropriate in each case) for review and approval.

Upon approval by the Accreditation Liaison, the draft plan with documents will be forwarded to the IE Council for review and approval. A special meeting of the Council will be called if necessary to meet the deadlines established for submission to SACSCOC.

4. Upon approval by the IE Council, the draft plan and documents will be

forwarded to the President for review and approval.

5. The President will provide the Chancellor with a copy of the approved teach-out plan and all associated documents.
6. The teach-out plan with associated documents will then be sent to the President of SACSCOC, following SACSCOC current requirements for method of submission. Copies shall be provided to the President's office, the Accreditation Liaison, the VPAS and VPSS, and all relevant Dean(s).

**Category D. If both notification and approval are required before implementation.**

Both notification and approval are required by the following:

Procedures for the following types of changes are included in the separate SACSCOC policy *Mergers, Consolidations, Change of Ownership, Acquisitions, and Change of Governance, Control, Form, or Legal Status*:

- initiating a merger or consolidation;
- acquiring an institution or location (including programs) of another institution;
- initiating a change of ownership;
- initiating a change of governance, control, form, or legal status; and
- adding as a permanent off-campus instructional site a location at which the institution is conducting a teach-out for students of another institution;

Procedures for approval of direct assessment competency-based education programs are in the separate SACSCOC policy *Direct Assessment Competency-Based Educational Programs*.

**College response:**

1. The President will notify the Chancellor of the proposed substantive change.
2. Upon approval by the Chancellor (or his designees), the President (and the Chief Executive Officer of the other institution if two institutions are involved and both are accredited by SACSCOC) and appropriate VP(s) will draft the letter of notification and all other documents that may be required for notification.
3. The draft letter of notification and documents will be reviewed by the Chancellor (or his designee).
4. Upon approval by the Chancellor (or designee), the President will submit the signed letter of notification and all required documents to the President of SACSCOC.
5. The SACSCOC President will respond with a request that the member institution(s) submit a (joint) written prospectus.
6. Upon response from the SACSCOC and request for the (possibly joint) prospectus, the relevant VP(s) will draft the prospectus and all other required documents.

The draft documents will be forwarded to the Accreditation Liaison (and others at the college(s) as may be deemed appropriate in each case) for review and approval.

7. Upon approval by the Accreditation Liaison, the documents will be forwarded to the IE Council for review and approval.

8. Upon approval by the IE Council, the documents will be forwarded to the President for review and approval.
9. The President will provide the Chancellor with copies of the documents for review and approval.

**Category E. Institutional Contingency Teach-out Plan:**

*For accredited institutions an institutional contingency teach-out plan must be approved if any of the following occur:*

- a. the institution is placed on probation by SACSCOC,*
- b. SACSCOC acts to end the institution's accreditation,*
- c. the institution's state authorization is revoked,*
- d. the institution is on provisional certification for federal financial aid by USDOE,*
- e. the institution is on reimbursement for federal financial aid by USDOE, or*
- f. the institution is the subject of emergency action by USDOE.*

*A contingency teach-out plan is created in due diligence as precaution rather than as an imminent closure plan. Should closure become necessary, the contingency teach-out plan becomes the institutional closure plan, subject to revisions as warranted. The objective of a contingency teach-out plan is assurance of adequate institutional planning and SACSCOC concurrence for the benefit of students, faculty, and staff well in advance of immediate need. The contingency teach-out plan must detail, for each institutional program, how the institution will provide options for students to complete their programs of study with minimal disruption and additional costs, including identification of comparable programs and institutions. Teach-out agreements may be included.*

**College Response:**

1. The President will notify the Chancellor of the need for an institutional contingency teach-out plan. Upon approval, the President and Vice Presidents will coordinate preparation of the required documents as itemized in Appendix C of the SACSCOC Substantive Change Policy and Procedures.
2. All draft documents will be reviewed by the President.
3. Upon approval by the President, the draft documents will be reviewed by the Chancellor (or his designee).
4. Upon approval by the Chancellor (or his designee), the SACSCOC liaison for the college will submit documents to SACSCOC as required by current SACSCOC policy.

Attachments:

Date Created: February 15, 2018

Date Updated/ Approved: February 23, 2021

Revised/ Approved: November 7, 2023

Approved:

(signed: Katherine Doss)

Vice President of College Services

(signed: Patrick Lee )

Vice President of Academic Success

(signed: Delilah Marquez )

Interim Vice President of Student Success

(signed: Dr. Robert Garza)

President