

Procedure 6.1701

Substantive Change Internal Processes Procedure

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Internal Processes to Monitor Substantive Changes Type I *General*

This manual establishes the processes for identification, creation and submission of Substantive Changes. The manual is not intended to replace the guidelines in the Southern Association of Colleges and Schools Commission on Colleges' (SACSCOC) Substantive Change Policy Statement. Users of this manual are encouraged to visit the [SACSCOC Website](#), and review the most recent Substantive Change Policy Statement when beginning their internal substantive change processes. The purpose of this manual is to demonstrate the various flows required internal to the College to ensure timely identification of substantive change situations, timely creation of the substantive change action(s), and full compliance with current requirements as outlined in the SACSCOC Policy Statement.

Internal Process Related to Substantive Changes Type II *Procedures Related to Degree*

- 2.1 Initiating coursework or programs at a more advanced level than currently approved.
- 2.2 Expanding at current degree level (significant departure from current programs).
- 2.3 Initiating programs at a lower degree level.

Background: The College is currently approved to offer Associates of Applied Science Degree, College Transfer, and General Education two-year degrees (all at Level I under the SACSCOC criteria). Our college will not seek approval to offer degrees at a level higher than the current Level I (Associate's Degree level). We intend to stay true to our mission as a two-year community college.

Internal Process for Reporting of Substantive Change: The College is part of the North Carolina Community College System (NCCCS) which requires a formal program application for programs or level changes at any of the 58 Community Colleges within the System. This formal program approval process requires:

- (1) A formal needs assessment and impact statement as it relates to offerings by other colleges within the local area.
- (2) Documentation supporting approval by the College Curriculum Committee comprised of faculty and staff members.
- (3) Approval of the program/level change by the College Board of Trustees.
- (4) Approval by the NCCCS and/or the State Board of Community Colleges, prior to implementation of the requested change.
- (5) This formal NCCCS mandated application process ensures that all parties involved in new program or major program modifications would be directly involved with any pending request well in advance of the SACSCOC requirement for official notification of the pending change at least six months prior to the implementation date. Additionally, to ensure the substantive change reporting is included in the program application consideration process, our college recently created the following instruments which are used by Academic Deans and Lead Instructors to request changes in program offerings or new programs.
 - The College Curriculum Change Packet ([BCCC Forms](#))
 - Checklist of Substantive Change Triggers Analysis Process (Appendix 1)

- The College Curriculum Approval Process (Appendix 2)
- (6) The College Curriculum Change Packet's original intended purpose was to create a formal monitoring device for identifying possible substantive changes related to new programs. It is important to note that all substantive change requirements, related to new programs and/or program changes, are included within the document in bold print. This ensures all faculty and staff are acutely aware of the importance of the substantive change reporting requirements.
 - (7) NCCCS has recently revised their program application process to include the requirement that future program applications from all 58 community colleges within the System include a narrative description of the steps taken to remain in compliance with Substantive Change reporting. NCCCS will not take any approval action steps on the program application without this detailed clarification statement being included in the application. The instruments identified in (5) above will provide the additional checks and balances needed to ensure that substantive change requirements remain a high priority and receive the full attention of all institutional stakeholders involved in the requested change.
 - (8) The NCCCS Curriculum Program Application is located in the NCCC Curriculum Procedures Reference Manual which is can be found at the [NC Community Colleges Website](#).

Internal Process Related to Substantive Changes Type III *Initiating a Branch Campus*

Background: The College has historically not employed branch campuses. We will continue to monitor this Substantive Change Notification requirement.

Internal Procedure for Reporting of Substantive Change: The College, as part of the NCCCS, must seek approval from the College Board of Trustees and the NCCCS Board of Community Colleges prior to implementing a branch campus. The NCCCS application process for starting of a new campus includes a statewide requirement to complete and have approved an application for an Off-Campus Center/Multi-Campus College. Included in this application is a requirement to show the College Board of Trustees and/or the NC Board of Community Colleges that the required Substantive Change notification has been submitted to SACSCOC. Neither Board will take action on this request until colleges requesting a branch campus have included details on the substantive change notification/prospectus submission.

This application also includes many of the same items required within a prospectus to SACSCOC, including but not limited to,

- (1) Needs assessment for the branch campus.
- (2) Specific programs to be offered at the branch campus.
- (3) County government maintenance and operational support.
- (4) Impact on other institutions in the local area to the branch campus.
- (5) A cost-benefit analysis to show that cost/expenses are justified from a cost effectiveness and quality perspective.
- (6) An overview of the programs/courses to be offered at the branch campus, including a description of the support services that will be in place to support the students attending the branch campus and specific equipment and faculty-staff needs to accommodate student needs.

Additional Controls to Ensure Timely Submission of Substantive Changes:

The College's Vice President of Academics is responsible for taking the lead on the development and submittal of the above described document to NCCCS. The Vice President of Academics works closely with the College President and Senior Staff to ensure all compliance issues are addressed. The completed application for an Off-Campus Center/Multi-Campus College will not be released to the College Board of Trustees and the NC State Board of Community Colleges until all issues are fully addressed.

Internal Process Related to Substantive Changes Type IV *Initiating Off-Campus Sites*

- Student can obtain 50% or more credits toward program
- Student can obtain 25% - 49% of credit
- Student can obtain 24% or less

Background: The College recently experienced a leadership transition with an 80% change at the Committee level of Administration. The new leadership quickly realized the area of initiating off-campus site reporting had become a compliance issue for the College.

After attending a recent SACSCOC workshop, Reporting Substantive Changes, we initiated an internal audit, which disclosed several non-reported substantive changes. The College did not have a viable mechanism for quick identification of programs that were held at off-campus locations. As a result, the College could not measure at what point a student attending classes at off-campus locations could acquire 25% or more of program requirements at specific off-campus sites.

Immediately upon discovering this finding and to ensure we remain in compliance with Standard 1.1 of the Principles of Accreditation, Foundations for Quality Enhancement, 2008 edition, (Standard 1.1: The Institution operates with integrity in all matters), the College reported our internal audit findings to SACSCOC in a letter dated October 14, 2013. Our disclosure to SACSCOC prompted your letter dated November 25, 2013 requesting that we prepare an analysis of our internal procedures to prevent reoccurrences of this reporting problem in the future.

In the interim, between the release of our letter of disclosure and the response letter from SACSCOC, our college began to develop an electronic database system to ensure future reporting.

Internal Procedure for Reporting of Substantive Change: As a result of our findings in the internal self-evaluation described above, we realized the need to improve our processes for determining how and when students could achieve the identified SACSCOC levels of program completion at off-campus sites.

In our previously described internal audit, we first looked for an automated/technological solution to the problem. Unfortunately, we could not identify an existing electronic system. Instead, we developed a paper and pencil system as an interim measure. The paper and pencil system is described below:

- (1) Through our current Datatel System, we identified all off-campus site locations where students are currently able to complete courses and programs through multiple delivery methods. We also developed a Site Approval Process (Appendix 3) to provide us with a means for up-to-date

information on the development of new sites. The process is driven by the request of new site codes in order to offer classes at a new location.

- (2) Using the College Catalog and the Datatel Systems, we identified all possible programs, including certificates, diplomas, and degrees that students can pursue by taking courses offered at off-campus sites.

We are currently monitoring these sites and percentage cut-offs by using information from Datatel and the catalog in a paper-pencil process while we attempt to develop an electronic means for monitoring the possible reporting combinations in the high school sites.

- (3) We will manually compute the percentage rate for each program, for each level, and for each site to obtain our base-line for SACSCOC.
- (4) We identified several situations where percentages of completion were already past the point when SACSCOC notifications should have occurred. We immediately reported those findings to SACSCOC with the October 14, 2013 letter.
- (5) Initial plans have been made to develop a database program to include every course and delivery mode in our Datatel System, every program of instruction, including all three levels (degree, diploma, and certificate) and every program site of the College. The final result will be the monitoring of every site by every assigned program level and the triggering of percentages of course availability. Upon completion, the database system under development will replace our current manual system. The completion date was December 2014.

Internal Process Related to Substantive Changes Type V *Adding Significantly Different Programs at an Approved Site*

(Note: Only if programs are currently approved)

Background: The College has a process for timely reporting of this substantive change requirement, which is described below. Therefore, we do not anticipate changing this time-tested and proven process in future activities.

Internal Procedure for Reporting of Substantive Change: When currently approved programs are added to existing approved sites, we notify SACSCOC via letter prior to implementation. Academic Deans propose the forwarding of significantly different program(s) at an approved site to the College Curriculum Committee. The Curriculum Committee will review and approve/disapprove the request and notify Senior Staff. Senior Staff will give final approval and the College President will then notify SACSCOC.

Assessment of Internal Checks and Balances: With the checks and balances described in the preceding paragraphs, the College is comfortable that any and all future program additions, moves or modifications, at existing approved sites, will be identified and allow for continued and timely SACSCOC notifications.

See Appendix 4 BCCC Process Flow Chart / Adding a Significantly Different Program at an Approved Site.

Internal Process Related to Substantive Changes Type VI *Initiating Distance Learning*

- Offering 50% or more of program (Subsequent programs do not need reporting unless they are significant departures from initially approved program(s))
- Offering 25%-49%
- Offering 24% or less

Background: Through a statewide substantive change, the College was previously approved to offer 50% or more of a program's credit electronically and we therefore are in full compliance with this notification requirement for current and all future programs achieving 24% or higher program participation levels.

Internal Procedure for Reporting of Substantive Change: Regardless of the prior approval, for the College to offer 50% or more of a program's credit electronically, we still provide a written notification letter to SACSCOC to update them on the specific date that a program moves across the 50% threshold. We realize this notification letter is not officially required, due to the prior approval, but to assist SACSCOC with file maintenance and updating, we will continue to notify SACSCOC as programs move beyond the 50% threshold.

Additional Controls to Ensure Timely Submission of Substantive Changes: None required since the College is already in full compliance with SACSCOC notification requirements due to our prior approval to offer 50% or more of a program's credit electronically.

Internal Process Related to Substantive Changes Type VII Initiating Programs/Courses Offered Through Contractual Agreement or Consortium

Background: The College experienced problems in the past reporting this substantive change. On October 14, 2013, we notified SACSCOC of three un-reported situations.

Internal Procedure for Reporting of Substantive Change: The newly created the College Curriculum Change Packet has substantive change actions included throughout the processing flow, bolded for emphasis of importance, and ensures continued monitoring until the official SACSCOC notification letter is released. This procedure will ensure timely notifications for future contractual agreements or consortiums, just as it will provide for the timely notifications of new degree programs, certificates, or diplomas.

Additional Controls to Ensure Timely Submission of Substantive Changes: The Vice President of Academics monitors this process and will ensure timely revisions, updates, and re-approvals by the College Board of Trustees. The Vice President of Academics has been tasked to personally monitor substantive change situations, as changes in contractual agreements and/or consortiums are prepared for the College's Board of Trustees' consideration and/or approval.

Internal Process Related to Substantive Changes Type VIII *Procedures Related to Mergers, Relocations, Governance & Closings*

- 8.1 Initiating a merger/consolidation.
- 8.2 Relocating a campus.
- 8.3 Changing governance, ownership, control, or legal status.
- 8.4 Closing an institution/program; initiating teach-out agreements (see SACSCOC Commission Policy).

Background: The College has a process that ensures full compliance with the identification of Substantive Change requirements for each of the above possible situations.

Internal Procedure for Reporting of Substantive Change: In each of the above situations, the College Senior Staff will determine the feasibility of the proposal and the implications related to our College Mission. The Vice President of Academics will prepare all legal documentation required by NC Community College System (NCCCS) to ensure the documents are reviewed and approved by Senior Staff, the College President, and the College Board of Trustees prior to release of the documents to NCCCS for State Board of Community College action.

The Vice President of Academics is also responsible for the preparation of the SACSCOC notification letter for review and approval by Senior Staff and the President. The Vice President of Academics will evaluate the proposed action against the Substantive Change requirements for a prospectus. Should a prospectus be required, the Vice President of Academics will ensure the prospectus is prepared and submitted at least six months prior to the implementation date of the proposed action.

Additional Controls to Ensure Timely Submission of Substantive Changes:

All of these actions, including monitoring of the prospectus, would remain regular information items at the College Board of Trustees' meetings until full implementation. This will ensure continued oversight of the entire process by the College President, Senior Staff, and the College Board of Trustees while the action is being approved for implementation.

See Appendix 5 Process Flow Charts: Community College Mergers; Relocations; Change of Governance, Ownership or Legal Status; and Closings.

Internal Process Related to Substantive Changes Type IX *Alternating Significantly the Educational Mission of the Institution*

Background: As previously discussed, the College will remain true to its mission as a two year degree (Level 1) college. We will not transform into a Level II or higher institution. Additionally, in 2013, the College Board of Trustees approved our College Mission Statement which reads:

“The College is a public comprehensive community college committed to providing accessible and affordable quality education, effective teaching, relevant training, and lifelong learning opportunities for the people served by the College.”

This mission statement is reviewed by the Board of Trustees on an annual basis and reaffirmed to ensure a continued plan of operations within the Annual Strategic Plan covering the upcoming five- year period.

Internal Procedure for Reporting of Substantive Change: Regardless that the College will not change its educational mission, we have included an internal procedure in this document related to this substantive change item. If environmental or legal circumstances should ever require a change in the educational mission, the following steps would be utilized to ensure timely preparation and release of the Substantive Change notification and prospectus:

- (1) The Vice President of Academics would prepare all NC Community College System (NCCCS) and NC Administrative Code documents required for the change in educational mission. This Vice President would also be responsible to prepare the College President's notification letter to SACSCOC, which would be released at the same time the legal documentation was released to NCCCS.
- (2) The Vice President of Academics will ensure Senior Staff, the College President, and the College Board of Trustees are updated on legal documentation and substantive change notification procedures until such time as SACSCOC and/or NCCCS has acknowledged acceptance of the documents. This Vice President will also prepare and release the required prospectus related to this educational mission change within the required six months prior to implementation date.
- (3) The Vice President of Academics, in direct coordination with the College President, will coordinate the timely production and release of the substantive change prospectus and monitor the action until SACSCOC accepts the substantive change prospectus.

- (4) The College President will provide monthly updates to the College Board of Trustees of the status of legal and substantive change documentation until final implementation of the proposed change in educational mission.

Again, the College does not envision any circumstances that would require us to submit a change in educational mission. We fully intend to remain a Level I, two- year community college focused on workforce development in the global 21st Century and beyond.

Internal Process Related to Substantive Changes Type X *Altering Significantly the Length of a Program*

Background: As part of our internal review of substantive changes and internal processes related to timely notification to SACSCOC, we determined that this type of substantive change can be monitored and controlled using the same process(es) described in Type II *Procedures Related to Degree*.

Internal Procedure for Reporting of Substantive Change: To ensure substantive change reporting is continually monitored and allows for the timely release of the SACSCOC notification and prospectus, at least six months prior to implementation date, we will use the previously described:

- BCCC Curriculum Change Packet
([BCCC Forms](#))
- Checklist of Substantive Change Triggers Analysis Process (Appendix 1)
- BCCC Curriculum Approval Process (Appendix 2)

Use of these documents and process flows will ensure full compliance with timely notifications and subsequent prospectus submissions, just as these documents support the timely submission of the Type of Change: *Expanding at current degree level (significant departure from current programs)*. We have found these control devices to be useful in a variety of the situations where a substantive change is required, including this one.

Internal Process Related to Substantive Changes Type XI *Initiating Degree Completion Programs*

Background: The College has not initiated degree completion programs in the past, nor do we intend to initiate any in the future (such as adult or accelerated programs in management or organizational leadership).

Internal Procedure for Reporting of Substantive Change: Since the College uses our Continuing Education Division for the delivery of accelerated training to support workforce development, any accelerated training coursework would first be offered through Continuing Education. Should a decision ever be made to move an accelerated program of study from the Continuing Education Division to the Curriculum Division, it would be processed following the process previously described in Type II *Procedures Related to Degree*.

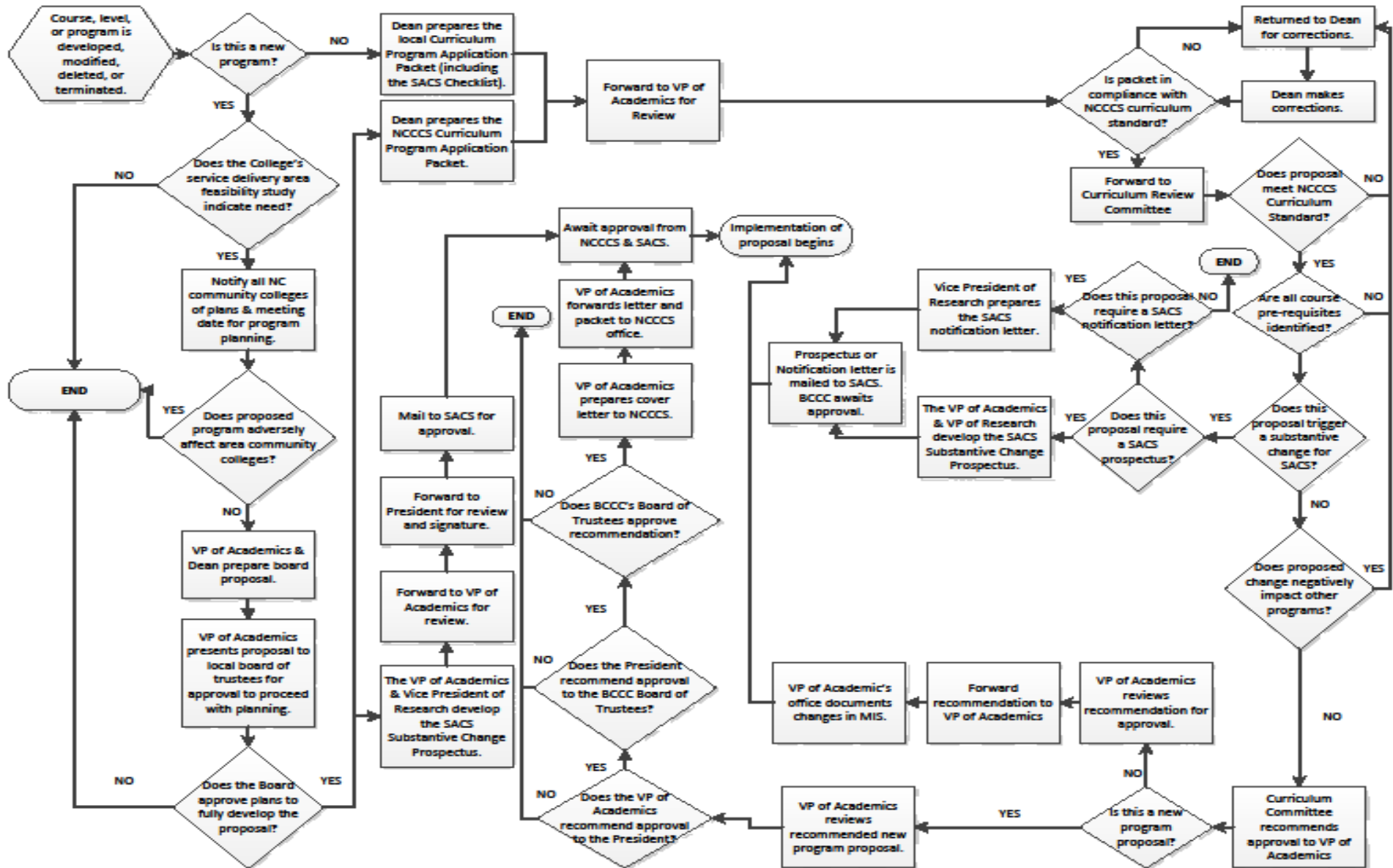
Appendix 1 Checklist of Substantive Change Triggers Analysis Process

SACSCOC BCCC CHECKLIST OF SUBSTANTIVE CHANGE TRIGGERS ANALYSIS PROCESS

Please indicate the substantive change indicated. All boxes must be complete prior to submission to the Curriculum Committee.

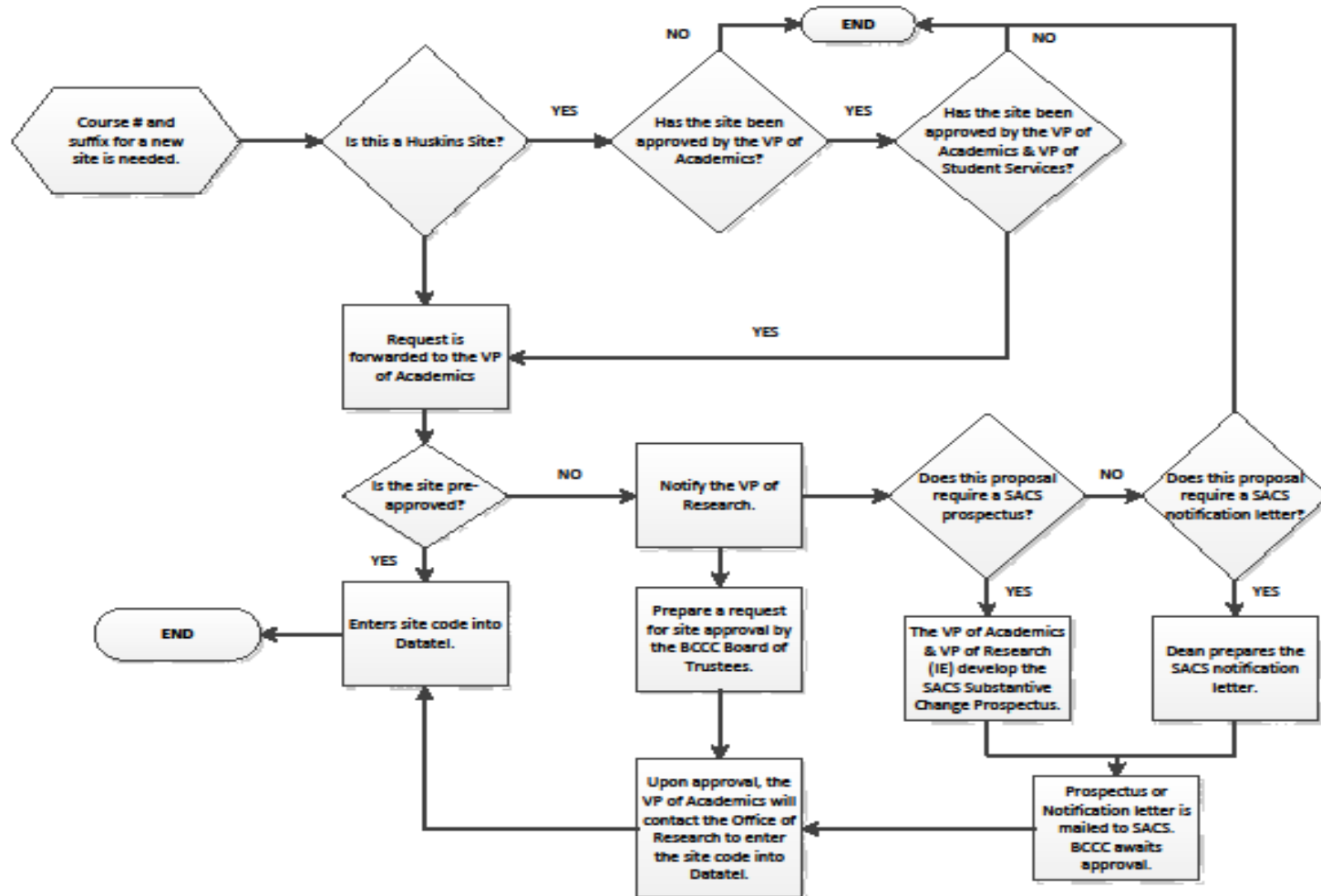
| Academic Division | | | | |
|-------------------------|-----------|-------------------------|-----------------------------|-----------------------------------|
| Academic Dean | | | | |
| Date | | | | |
| State Curriculum Change | | | | |
| Types of Change | Procedure | Prior Approval Required | Prior Notification Required | Time Frame for Contacting SACSCOC |
| | | | | |
| | | | | |

Appendix 2 BCCC Curriculum Approval Process



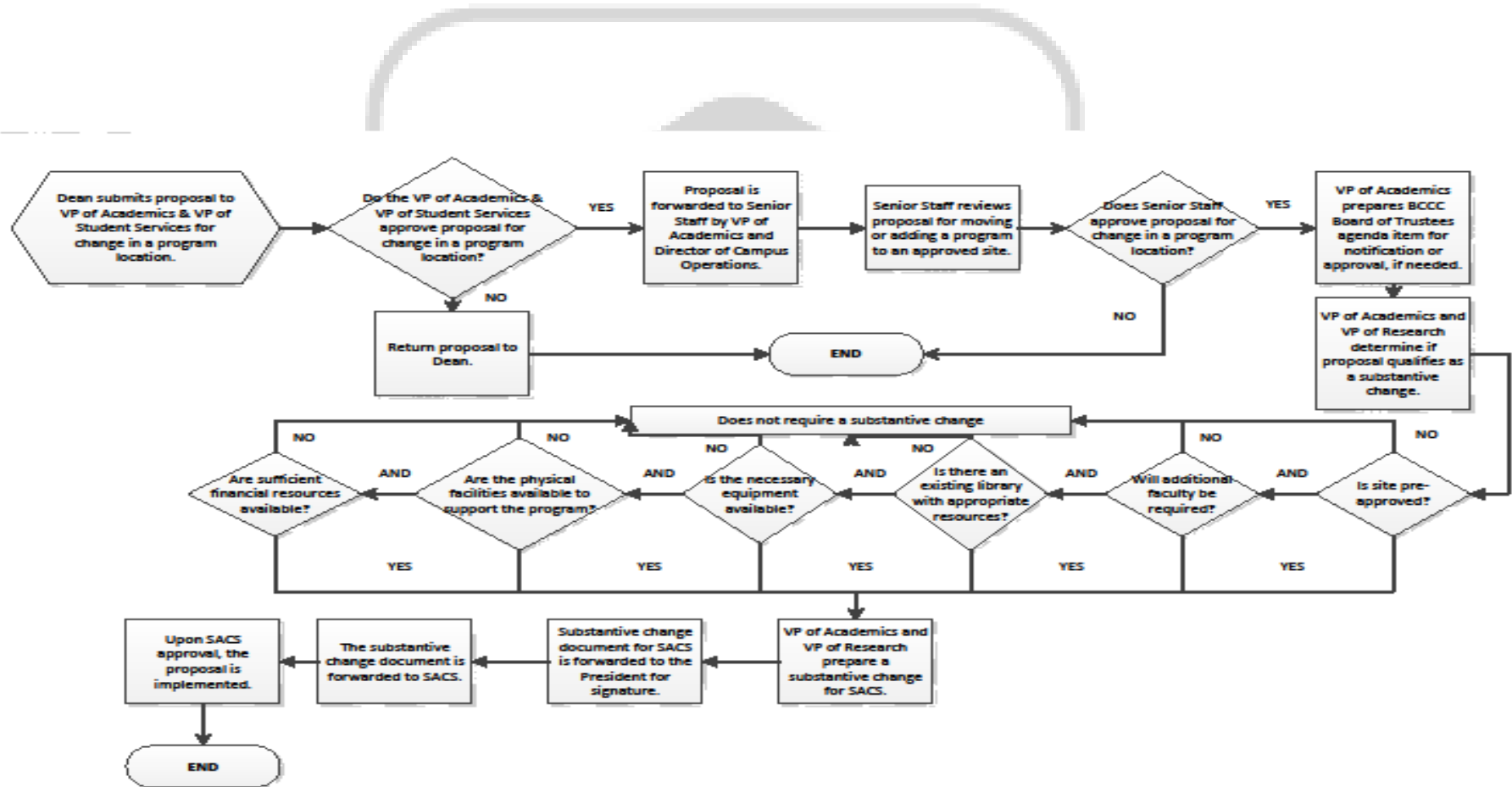
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Appendix 3 Site Approval Process



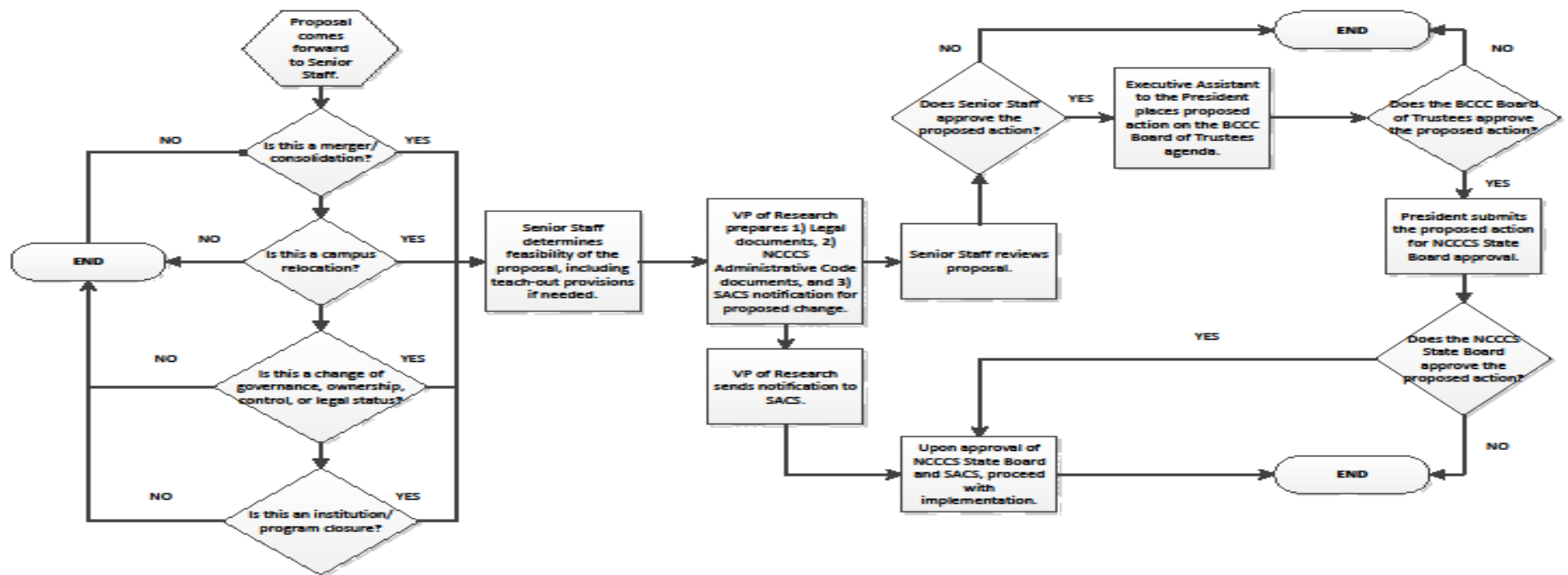
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Appendix 4 BCCC Process Flow Chart/Adding a Significantly Different Program at an Approved Site



Appendix 5 Process Flow Charts

- Community College Mergers
- Relocations
- Change of Governance, Ownership, or Legal Status
- Closings



Procedure

SACSCOC References: *Enter SACSCOC references here*

Cross References: [Substantive Change Policy](#)

History

Senior Staff Review/Approval Dates: *3/21/16*

Board of Trustees Review/Approval Dates: *Enter date(s) here*

Implementation Dates: *June 2015*