

## Discussion of Proposed Substantive Change Process January 2016

### Overview

This item was initially presented at the October 2015 COA meeting at which time staff was directed to bring it back for discussion at the January 2016 meeting. The item provides information about a possible substantive change approval requirement within the newly strengthened and streamlined accreditation system.

### Staff Recommendation

This item is information and discussion.

### Background

Currently an institution may make any changes to a program so long as the changes are still in alignment with standards and there is notification in the biennial report. The institution and its Commission-approved programs are responsible for monitoring the changes and ensuring that the changes are in alignment with the adopted standards. Sometimes these changes are significant. Currently, the Commission does not review or approve the changes, even if they are significant in scope. Concerns have been raised that the institution may no longer be operating a program that bears any similarity to the program that was reviewed and approved. For instance, a program offered face to face at one time may be changed to one that is offered entirely online. Under the current system, the institution would notify the Commission in its Biennial Report and follow up would take place during the program assessment and site visit processes.

As part of the effort to strengthen and streamline the accreditation system, the Accreditation Policy and Procedures task group proposed the implementation of a substantive change approval process to ensure that major changes are in alignment with standards prior to those changes taking place. This topic was presented at the June 2015 Commission meeting as part of an update on the work of this task group. (<http://www.ctc.ca.gov/commission/agendas/2015-06/2015-06-5C.pdf>).

Commissioners cautioned staff that the substantive change process has the potential risk of defeating the overall spirit of wanting to make the accreditation process more streamlined. The substantive change process used by the Western Association of Schools and Colleges (WASC) Senior was cited as an example of a process that is too onerous. A flow chart of the WASC process is included in Appendix A for information.

Although the process may be too cumbersome, it may be useful to examine the criteria <http://www.wasc senior.org/announcements/revised-substantive-change-manual> that WASC Senior uses to define substantive change. Some of WASC's substantive change guidelines include:

- Changes of 25% or more in the curriculum

- When 50% or more of the revised program is now offered online
- Adding a branch campus
- Significant change in length of program

### **Questions for Discussion**

1. Should substantive change policies be part of its accreditation requirements?
2. How would we determine or define substantive?
3. What would be the process for approving substantive changes?
4. What would be the role of the COA?

### **Next Steps**

If the COA decides that a substantive change policy should be added to the accreditation requirements, staff will draft policy and procedures to bring back to the COA and the Commission for approval.

## Appendix A WASC Substantive Change Process

**Substantive Change Process Flow Diagram**

