

Substantive Change Procedure

Section 1: References and Resources

VPCC Policy [802.00 Substantive Change Policy](#)

[SACSCOC Substantive Change Policy and Procedures](#)

[SACSCOC Principles of Accreditation \(2024\), Standard 14.2](#)

Section 2: Purpose

The purpose for the following procedures is to clarify the steps taken by Virginia Peninsula Community College (VPCC) personnel for identifying substantive changes and for reporting substantive changes to SACSCOC. They are designed to provide additional direction and build upon the SACSCOC Substantive Change Policy and Procedures. VPCC must abide by SACSCOC policy and, in the case of any discrepancies, defer to the SACSCOC policy.

Section 3: Procedure

Upon identification of an impending substantive change, the SACSCOC Liaison, or their designee, will:

- 3.1 Determine whether notification or approval of substantive change is required. **Notification** is required for the following types of substantive change:
 - 3.1.1 Program Change to allow competency-based education by direct assessment for 25%- 49% of the program.
 - 3.1.2 Cooperative Academic Arrangement with other Title IV eligible entity for 50% or more of the program.
 - 3.1.3 Cooperative Academic Arrangement with non-Title IV eligible entity for less than 25% of the program.
 - 3.1.4 Dual or Joint Academic Award Arrangements where students receive instruction at two or more institutions that grant credentials of the same level (excludes entities that provide credentials across levels, i.e., high school and community college or community college and baccalaureate college or university). Dual awards are awarded when each institution awards its own credential and joint awards are awarded when both institutions award a joint credential to the student.
 - 3.1.5 An institution that has already been approved for distance or correspondence education and is not on an institutional substantive change restriction, that changes the method of instructional delivery to 50% or more of the instruction (face-to-face to distance/ correspondence or vice versa).

- 3.1.6 Initiating a new program with 25%-49% new content and not on an institutional substantive change restriction.
- 3.1.7 Initiating a new program designed to accept credit for prior learning and not on an institutional substantive change restriction.
- 3.1.8 Initiating a new off-campus instructional site where 25%-49% of the program is offered.
- 3.1.9 Relocating an off-campus instructional site (excluding branch campuses).
- 3.1.10 Changing the name or address of an off-campus instructional site.
- 3.1.11 Re-opening a closed program within 5-years of the closure date.
- 3.1.12 Re-opening a closed off-campus location within 5-years of the closure date.
- 3.2 Determine whether a teach-out plan is required. These types of substantive changes require approval of the teach-out plan by the Executive Council, but due to the time-sensitive nature of these changes, the teach-out plan should be submitted as soon as possible after substantive change is anticipated and implementation of the plan can begin prior to approval. **Teach-out Plans** are required for the following types of substantive changes:
 - 3.2.1 Institutional closure.
 - 3.2.2 Institution is placed on probation, accreditation ends, the institution is on provisional certification for financial aid, reimbursement of financial aid is required, the institution is under heightened cash monitoring, the US Department of Education places an emergency action on the institution, or state authorization to issue credentials is revoked. These situations require a contingency teach out plan in case of subsequent institutional closure.
 - 3.2.3 Program closure or program closure at a particular campus or off-campus instructional site.
 - 3.2.4 Off-Campus instructional site closure.
- 3.3 Determine whether approval of the substantive change requires the full Board of Trustees approval or approval by the Executive Council of the Board of Trustees. The Executive Council meets year-round, while the full Board of Trustees only meets biannually.
 - 3.3.1 Changes requiring approval from the **Executive Council of the Board**:
 - A. Any change requiring a teach out plan (see above).
 - B. A new program is designed with prior learning as a condition of admission while on an institutional substantive change restriction.
 - C. Changing the college or a program from a measure of student progress of clock hours to credit hours or vice versa.
 - D. The first program at an institution where 50% or more of a program can be earned through competency-based education of some kind.

- E. The first program at an institution where 50% or more of a program can be completed through distance or correspondence education.
- F. The relocation of an institution.
- G. A significant change of the institutional mission (not simple wording differences, but rather an expansion of scope).
- H. Cooperative academic arrangements with non-Title IV entities for 25%-50% of the program.
- I. Changing the method of a program's instructional delivery for more than 50% of the program (face-to-face to distance or vice versa) if the first program at an institution to adopt this new method, if on an institutional substantive change restriction, or if a part of the Prison Education Program.
- J. New program where 50%-100% of the content is a significant departure from what the institution currently offers. If on an institutional substantive change restriction, then the threshold is for 25%-50% of content to be different.
- K. Change in a program length of more than 25%, or more than one term of expected time, to complete.
- L. Initiating a new off-campus instructional site where more than 50% of the program is offered (limited review).
- M. Off-campus instructional site relocation of a branch campus.
- N. Entering into the Prison Education Program.

3.3.2 Changes requiring **approval from the Full Board of Trustees**:

- A. Changing the level of academic credential offered (i.e., associates to baccalaureate).
- B. Any change to allow more than 50% of a program to be earned through competency-based education through direct assessment.
- C. Initiating a new off-campus site if requiring an extensive review; extensive review is required when on substantive change restriction, for the first two off-campus locations, or who has not successfully completed at least one accreditation reaffirmation.
- D. The sale, exchange, or transfer of a component of another institution (acquisition).
- E. The merger or consolidation of two institutions into one.
- F. A change in ownership, means of control, or legal status of an institution.
- G. Significant revision to the governing board by-laws, scope of authority, number of board members, or how board members are selected.

3.4 Determine the **Submission Deadline**.

- 3.4.1 **Notifications** do not require approval; the notification should be submitted prior to the substantive change being made but do not require receipt of a letter back before implementing the change.
- 3.4.2 **Teach-out plans** require approval from the Executive Council, however, due to the time sensitive nature of the change, may be implemented prior to approval being received. The Teach-out plan should be submitted as soon as possible after the need for one has been identified.
- 3.4.3 For changes requiring approval by the Executive Council of the Board, the submission deadlines are:
- A. **January 1** for changes to be implemented July 1- December 31 of same year.
 - B. **July 1** for changes to be implemented January 1- June 30 of subsequent year.
- 3.4.4 For changes requiring approval by the full Board of Trustees, the submission deadlines are:
- A. **March 15** for review at the Board's biannual meeting in June and implemented after review.
 - B. **September 1** for review at the Board's biannual meeting in December and implemented after review.
 - C. Major institutional changes (acquisitions, mergers, changes in ownership or governance) require **six months' notice** prior to the biannual meeting.
- 3.5 Determine what documents are required for submission. Notifications typically require specific information based upon the type of change. Most other changes require a Prospectus, with details and a template for each type of change outlined in the SACSCOC Substantive Change Policy and Procedures.
- 3.6 The SACSCOC Liaison, their designee, and/or the substantive change workgroup will prepare the documents for submission. The SACSCOC Liaison shall submit the documentation before the required deadline.

Section 4: Effective Date and Approval

Version	Date	Description of Change	Reviewed by	Approved by
1	10/29/2024	Initial draft proposed by Vice President of Institutional Effectiveness and Transformation, Steven Felker.	College Council, College Support Staff Association, Council of Mid-Level Managers, Faculty Senate,	Dr. Towuanna Porter Brannon, College President

			VPCC Executive Cabinet	
2	08/28/2026	Administrative updates completed by Chief of Staff Ada Badgley to follow the updated Policy and Procedure Templates approved as part of the 801.01 Policy on Policies effective 08.11.26.		Dr. Towuanna Porter Brannon, College President