CSN Policy	Policy and Procedures for Reporting Substantive Changes to the Accrediting Body			
Policy Category: Gene	eneral Effective Date: 04/24/20			

The Northwest Commission on Colleges and Universities (NWCCU) is the regional accrediting body for institutional accreditation for the College of Southern Nevada (CSN or the College) and its programs and services, regardless of location or delivery method. This accreditation provides public documentation of institutional quality and enables the College to participate in federal programs.

Accreditation obligations of CSN include adherence to established policies, procedures, eligibility requirements and standards as set forth by the NWCCU. In order to maintain good standing of accreditation with NWCCU, the College must demonstrate compliance with the *Eligibility Requirement, 20 Disclosure* and *Policy on Substantive Change*:

# The institution accurately discloses to the Commission all information the Commission may require to carry out its evaluation and accreditation functions.

The NWCCU policy statement on *Substantive Change* (January 2017) defines responsibility of NWCCU for substantive change as monitoring proposed changes of an accredited institution for change in its mission, core themes, scope ownership or control, area served, or other identified matters. The changes proposed may have impact on the resources and capacity of the institution. Changes are categorized as either major or minor. Official notification to NWCCU and approval from NWCCU is required prior to implementation of any substantive change. If CSN does not notify NWCCU of a substantive change before implementing a change, sanctions may be imposed. In addition, without NWCCU approval of a substantive change, students enrolled/participating in programs or receiving instruction at sites affected by the change are not/may not be eligible for federal financial aid.

The NWCCU *Substantive Change* policy classifies substantive changes into two broad categories, major and minor changes and include but are not limited to:

A **Major Change** has significant impact on the resources and capacity of the institution. A major change is of a magnitude to alter an institution's mission, objectives, and supporting core themes; the scope or degree level of its offerings; its autonomy, sponsorship, or the locus of control; its offering of academic programs for credit through contractual relationships with external organizations; its offering of programs for credit outside the NWCCU region; or, its campus locations including a branch campus or the establishment of an additional location apart from the main campus at which the institution offers at least 50 percent of an educational program.

A *Minor Change* has minimal impact on the resources and capacity of the institution. Most changes, such as adding programs that are allied with existing

offerings, or dropping programs, and changes in method of instructional delivery, are not major and therefore are categorized as minor changes.

To carry out the responsibilities and obligations for the disclosure, reporting, and seeking authorization of the NWCCU, responsibility is assigned to several key institutional positions.

## **Roles and Responsibilities**

CSN can only remain in compliance with NWCCU *Substantive Change* policy if college personnel including faculty and staff in various offices collect and share information. The roles and responsibilities of several key positions and a committee are described below:

Senior Vice President, Strategic Initiatives and Administrative Services (SVPSIAS): Serves as the NWCCU Accreditation Liaison Office (ALO) and is responsible for ensuring CSN's compliance with all substantive change policies. As the ALO, the Senior Vice President assures that all substantive changes are reported in a timely manner; maintains the *Accreditation* website designed to inform the entire College community of accreditation activity, accreditation reports, and schedule of visits; and pending compliance actions, substantive changes and NWCCU notifications and approvals.

### **Executive Leadership Team (ELT):**

Led by the President of CSN, this team is comprised of senior executives, including the Senior Vice President, Strategic Initiatives and Administrative Services/ALO, Vice President Academic Affairs, Vice President Finance, Vice President Student Affairs, and the General Counsel.

## Vice President, Academic Affairs (VPAA):

Provides oversight for all instructional and academic support functions; responsible for the obligations that may require reporting to the NWCCU, including but not limited to activity such as new certificate or degree programs, changes to existing programs, changes in the delivery of a program such as transition to full online delivery or competency based education (in some manner and/or full assessment), addition of a new instructional site, contractual agreements with accredited or non-accredited institutions impacting delivery of instruction, and other programmatic changes deemed necessary; assures that deans and department chairs are aware and adhere to all requirements of substantive change reporting obligations; serves as support to the ALO for all institutional substantive change reporting, and ensures timely, effective and quality reporting as required to the NWCCU to ensure compliance; and shares information for off-campus sites and locations with the Executive Leadership Team in advance of implementation to ensure proper coordination with all areas of CSN, and appoints Substantive Change Liaison(s) as requested by the ALO.

#### Associate Vice President, Academic Affairs (AVPAA):

Provides supervisory oversight of the Director of Curriculum and Scheduling; assists the SVPSIAS and the VPAA in monitoring for instances of substantive change and assists in the preparation of required documentation for timely and complete notification of substantive change to NWCCU, through the SVPSIAS; monitors policy changes and new off-campus sites, drafts reports of changes to off-campus sites and academic programs; and assists the SVPSIAS and VPAA in complying with other areas of academic policy.

#### **Academic Deans:**

Initiates on and off-campus course offerings in compliance with substantive change policies; keeps the campus Substantive Change Liaison informed of changes to existing programs, degrees, and offerings including off-campus course offerings planned for future terms; ensures appropriate coordination with respective institutional departments, services, and divisions for the comprehensive submission of academic program proposals, requests for deactivation, or new instructional sites for submission to the Substantive Change Liaison; and ensures that changes are only implemented after approval as received by the SVPSIAS and VPAA.

#### **Academic Department Chairs:**

Responsible for the scheduling of classes and sections for courses within the department under their purview; and works with faculty on programmatic changes including but not limited to the addition of new certificate or degree proposals, revision of existing program areas, request for name change, monitoring and advising of change to delivery of certificate or degree programs (such as the movement of 50% or greater of a program fully on-line), deactivation of certificate or degree programs, and the addition of course offerings at a new location.

#### Faculty:

All faculty must understand this policy for the purpose of identifying substantive changes and reporting them to their campus Substantive Change Liaison or appropriate dean.

#### Associate Vice President, Financial Aid:

Responsible for timely and accurate reporting of information to the US Department of Education (USDOE) associated with the Program Participation Agreement, including programmatic offerings, location of instructional sites, and other relevant information as prescribed by policy and procedures set forth by the USDOE; ensures all institutional financial aid administered by the department on behalf of students is in accordance with approved certificates and degree programs, instructional site locations, mode of delivery (as may be required by NWCCU and/or USDOE), and responsible for adhering to disbursement of federal Title IV funds that have been approved by NWCCU; and coordinates with the SVPSIAS/ALO to ensure compliance with all policies and procedures of CSN and NWCCU.

#### Associate Vice President, Institutional Research:

Responsible for coordination and submission of the CSN Annual Report to NWCCU in coordination with the SVPSIAS/ALO, Vice President Academic Affairs, Vice President Finance,

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and Vice President Student Affairs. The annual report to NWCCU includes information regarding CSN including: degree level of accreditation, student enrollments (including international students), number of full time and part time faculty, institutional finances (IPEDS information), CSN default rate from the USDE/National Student Loan Data System (NSLDS), CSN graduation rate, retention rate, institutional identification as minority serving and/or Hispanic serving institution, report of institutional significant growth (defined as 50% of more for a two-year period), report of programs experiencing significant growth, and program name changes (including change of 25% or more of Student Learning Outcomes).

#### **Registrar:**

Responsible for ensuring changes to certificate or degree programs, offering of courses at sites and locations, expansion or reduction of certificate or degree programs are applied only after NWCCU approval as received by the SVPSIAS/ALO; ensures that admissions to proposed deactivated programs are not suspended until NWCCU approval as received by the SVPSIAS/ALO and VPAA, and confirmation of the notification of students by the VPAA; and coordinates with the SVPSIAS/ALO to ensure compliance with all policies and procedures of CSN and NWCCU.

#### Senior Associate Vice President, Facilities Management (SAVP Facilities Management):

Responsible for all facilities in which CSN operates, including owned and/or leased spaces; participates in a biannual review of off-campus instructional sites for accuracy; and in instances where a currently approved off-campus instructional site is moved or a change of address occurs, will report to the SVPSIAS/ALO for submission to the NWCCU.

#### Accreditation/Substantive Change Liaisons (SCL):

Represents a department, service area or division of the College to provide review and reporting of information for proposed changes; serves as the point of contact for areas of accreditation, including concurrence with NWCCU eligibility requirements, standards, policies and procedures – including substantive change; and serves as a member of the Accreditation/Compliance Committee and is responsible for attendance at meetings, reporting of departmental/school plans for certificates and programs and locations.

#### Accreditation/Compliance Committee:

Chaired by the SVPSIAS and VPAA, includes the Substantive Change Liaisons, the AVPAA, a representative of the Office of Financial Aid, a representative of the Office of Registrar, a representative of the Office of Curriculum and Scheduling, and Director of Assessment. The Committee will meet quarterly to review and confirm anticipated substantive changes anticipated or in process.

## **Types of Changes and Procedure for Handling Each Change**

Substantive changes by CSN in addition to programmatic and location include those that reflect an impact to the mission and core themes, ownership, control, area served, or other significant matters in which there is an impact on resources and institutional capacity. These changes can primarily center around new or discontinued programs or new or discontinued off-campus sites. The following provides more detail about the procedures to be used for specific substantive changes. This list is not exhaustive of all required changes

but it does include for guidance the majority of substantive changes that may be required by academic departments, programs or services.

Procedures for addressing required changes are noted below, including the following:

- Type of Change;
- Contact of NWCCU identifies when CSN must submit changes (is prior approval from oversight bodies/entities needed);
- Prior Approval annotates whether CSN must have approval from the NWCCU prior to implementation;
- Responsible Authority who is responsible for coordination and submission to the SVPSIAS/ALO for processing through NWCCU;
- Documentation what is the form of submission to the NWCCU (i.e. substantive change, notification (letter); etc).

#### Substantive Changes Related to New or Revised Programs

Type of Change	Contact NWCCU	Is prior approval from NWCCU required before implementation?	Responsible Authority	Documentation
Initiating a new degree/certificate of 30 credits or more.	Following NSHE Academic Affairs Council and/or Board of Regents	Yes	VPAA and School SCL liaison	Substantive Change
Initiating a new degree/certificate at a level currently not offered (i.e. certificate, associate's or bachelor's degree).	Following NSHE Academic Affairs/Board of Regents approval	Yes	VPAA and School SCL liaison	Substantive Change
Substantial revisions to an existing certificate or degree program. (*see note).	Following Curriculum Committee review	Yes	VPAA and School SCL liaison	Substantive Change
Revisions to an existing certificate or degree program.	Following Curriculum Committee review	No	VPAA and SVPSIAS /ALO	Notification Letter

Type of Change	Contact NWCCU	Is prior approval from NWCCU required before implementation?	Responsible De	ocumentation
Certificate, degree or program name changes	Following NSHE Academic Affairs Council and/or Board of Regents		VPAA, AVPIR, A and SVPSIAS /ALO	Annual Report

\*Note: Substantial revisions may include but are not limited to: 25% change in course offerings or differential from program (increase or decrease in coursework); change in classification index program identifier (CIP) code; and change in Student Learning Outcomes. Advanced review with the VPAA and SVPSIAS/ALO is required.

New or revised programs must be approved by department chairs and deans. Proposals are submitted to the CSN Curriculum Committee for review. Following recommendation by the CSN Curriculum Committee, the CSN Executive Leadership Team will review and concur prior to submission to the NSHE Academic Affairs Council and/or Board of Regents. The VPAA and SVPSIAS/ALO will review modified programs to determine if the program is a significant departure from current offerings and will require a substantive change submission to NWCCU. If the new program is not a significant departure, the VPAA will prepare a notification letter to the SVPSIAS/ALO for review and submission to NWCCU. If the new program is a significant departure, following all necessary approvals including the CSN Curriculum Committee, Executive Team/Cabinet, NSHE Academic Affairs Council and/or Board of Regents, a substantive change will be submitted for approval by NWCCU.

After approval is received, the SVPSIAS will update the Accreditation website and provide notification to the VPAA, Academic Dean, Department Chair, AVPAA, Financial Aid, and other key constituents.

Type of Change	Contact NWCCU	Is prior approval from NWCCU required before implementation?	Responsible Authority	Documentation
Deactivation, closing, moratorium, or suspension of a currently offered certificate or degree program, of 30 credits or more.	Immediately following the decision to close the program and/or approval of the NSHE Academic Affairs Council and/or Board of Regents	Yes (*note)	VPAA	Substantive change and teach out agreement.

## **Discontinued Degree or Certificate Program**

\*Note: Student admissions may be suspended upon notification to all students of CSN's intention

to deactivate, close, placement of a moratorium, or suspension of the certificate or degree program, Page 6 of 13

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following the appropriate approval by the Curriculum Committee and Executive Leadership Team, and if required, NSHE Academic Affairs Council and/or Board of Regents. Completion of a program Teach Out and Substantive Change must be approved by the NWCCU prior to formal completion and institutional action.

The VPAA and AVPAA will work with the dean(s) responsible for the program to prepare appropriate documentation, including the substantive change and teach out plan(s) where necessary. The VPAA will prepare a letter of notification to all affected students of the intention to deactivate, close, place in moratorium, or suspend the program. Upon final approval by the NSHE Academic Affairs Council and/or Board of Regents the VPAA will notify the SVPSIAS for approval and submission to NWCCU.

After approval is received, the SVPSIAS will update the Accreditation website and provide notification to the VPAA, Academic Dean, Department Chair, AVPAA, Financial Aid, and other key constituents.

#### Change in mode of program delivery

CSN is required to submit a substantive change in instances in which a certificate or degree program is proposed to move from primarily face-to-face delivery to distance education/online. For purposes of reporting, certificate or degree programs in which 50% or more of the credits are delivered through distance education/online must be submitted for approval as a substantive change. In addition, in the case in which the College and/or a certificate or degree program is initially or subsequently delivered through competency based education delivery, the College must submit a substantive change.

Type of Change	Contact NWCCU	before	Responsible Authority	Documentation
Initial request to offer distance education and/or competency based education delivery (* note)	Upon CSN approval	implementation? Yes	ELT	Substantive Change
Delivery of a certificate or degree program in which 50% or more of the credits are provided through distance education and/or competency based education	Upon CSN approval	Yes	VPAA and SCL liaison	Substantive Change

\*Note (1): CSN has already been approved by NWCCU for the delivery of distance education at the institutional level. Any certificate or degree programs with 50% or more of the credits

delivered through distance education require submission of a substantive change. Note (2): CSN has not initiated offering competency based education at the institutional level or at the certificate or degree level. Any requests for delivery through this mode, will require submission to NWCCU in advance of implementation.

#### Offering Credit at a New Level

Type of Change	Contact NWCCU	Is prior approval from NWCCU required before implementation?	Responsible Authority	Documentation
Initiating coursework or programs at a different level than currently approved	Immediately following the decision of the NSHE Academic Affairs Council and/or Board of Regents	Yes	ELT	Substantive Change

CSN has authorization for the offering of bachelor's degree programs in select program areas/fields of study. If the College seeks to add an additional bachelor's degree in an area in which a certificate of achievement and/or associate's level program currently is offered, a substantive change is required for submission and approval by the NWCCU (this is noted in the section above titled "Substantive Changes related to New or Revised Programs"). If at any time the College pursues, upon approval by the Board of Regents, the offering of a degree program above the level of a bachelor's degree, CSN must submit and receive approval of NWCCU prior to implementation.

The new program and corresponding degree level must be approved by department chairs and deans. Proposals then must be approved by the Curriculum Committee, Executive Leadership Team, and, as appropriate, the NSHE Academic Affairs Council and/or Board of Regents.

After approval is received, the SVPSIAS will update the Accreditation website and provide notification to the VPAA, Academic Dean, Department Chair, AVPAA, Financial Aid, and other key constituents.

### Substantive Changes Related to Off-Campus Sites or New Branch Campuses

Type of Change	Contact NWCCU	Is prior approval from NWCCU required before implementation?	Responsible Authority	Documentation
Initiating new off-campus instructional site, within 20 miles of existing campus	Yes	Yes	VPAA, SCL liaison, AVP Financial Aid	Substantive Change
Initiating off campus site greater than 20 miles of existing campus	Yes	Yes	ELT	Substantive Change
Change of address or location of existing approved off-campus instructional site	Yes	No	SVPSIAS	Notification

## New Off-Campus Sites or Relocation of Existing Instructional Site

When any department or division at CSN anticipates offering credit courses at any new location, the SCL will contact the VPAA and SVPSIAS prior to the implementation or deployment of credit courses.

The academic dean/department chair will submit information required for a substantive change (major or minor depending on location/site) to the assigned SCL liaison for coordination with the VPAA and SVPSIAS. Review of appropriate Board of Regents policy for consideration and action will be completed by the ELT and coordination as appropriate. The SVPSIAS will submit for approval and authorization to NWCCU.

Should a change of address be initiated for a current off-campus instructional site, the SVPSIAS in collaboration with the SAVP Facilities Management will prepare a notification to NWCCU and coordinate with appropriate CSN departments and offices.

A complete review of off-campus sites and course offerings will take place twice a year, in March and October. The Accreditation/Compliance Committee will meet to review all anticipated new off-campus sites, and additional course offerings at all non-approved sites.

After approval is received, the SVPSIAS will update the Accreditation website and provide notification to the VPAA, Academic Dean, Department Chair, AVPAA, Financial Aid, and other key constituents.

#### **Branch Campuses**

CSN currently has three (3) primary campuses. The Charleston Campus is designated as the main campus, with other locations deemed instructional sites. The following procedures would be followed if CSN initiates a branch campus.

Type of Change	Contact NWCCU	Is prior approval from NWCCU required before implementation?	Responsible Authority	Documentation
Relocating a main or branch campus	Yes	Yes	ELT	Substantive Change
Initiating a branch campus	Yes	Yes	President & Executive Team	Substantive Change

In coordination with the SVPSIAS and other key stakeholders, the President and Executive Leadership Team will aid in preparing the Substantive Change (major) and appropriate documentation including but not limited to approval of the Board of Regents. The SVPSIAS will submit to NWCCU in advance of implementation.

After approval is received, the SVPSIAS will update the Accreditation website and provide notification to the VPAA, Academic Dean, Department Chair, AVPAA, Financial Aid, and other key constituents.

#### **Discontinuing Use of Off-Campus Site**

Type of Change	Contact NWCCU	Is prior approval from NWCCU required before implementation?	Responsible Authority	Documentation
Closing an approved site (*note)	Immediately following the decision to close the site	Yes	ELT	Substantive Change (*note)

\*Note: If the site provides for the delivery of a certificate or degree program of 30 credits or greater in whole and the location is to be closed, the substantive change will also include a teach out plan to address student completion of course work.

The VPAA and AVPAA will work with the dean(s) responsible for the program to

prepare appropriate documentation, including the teach out plan(s) where necessary. The VPAA will prepare a letter of notification to all affected students of the intention to discontinue the site and/or location. Upon approval by the ELT, the SVPSIAS will forward the submission to NWCCU for approval of the substantive change and teach out plan.

After approval is received, the SVPSIAS will update the Accreditation website and provide notification to the VPAA, Academic Dean, Department Chair, AVPAA, Financial Aid, and other key constituents.

#### Substantive changes related to Institutional Level Actions

The following institutional actions including change in mission core themes, and activities related to change in legal status or ownership/control, acquisition of another institution, or merger require submission of a substantive change and are the responsibility of the President and/or ELT.

Type of Change	Contact NWCCU	Is prior approval from NWCCU required before implementation?	Responsible Authority	Documentation
Change in mission statement	Following Board of Regents approval (*note)	Yes	President and SVPSIAS/ALO	Substantive Change
Change in core themes	Following Board of Regents approval (*note)	Yes	President and SVPSIAS/ALO	Substantive Change
Change in legal status	Following appropriate governing action	Yes	President and General Counsel	Substantive Change
Change in ownership/control	Following appropriate governing action	Yes	President and General Counsel	Substantive Change

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Type of Change	Contact NWCCU	Is prior approval from NWCCU required before implementation?	Responsible Authority	Documentation
Acquisition of another institution	Following Board of Regents approval	Yes	President and ELT	Substantive Change
Merger with another institution	Following Board of Regents and/or appropriate governing action		President and ELT	Substantive Change

\*Note: Change in mission statement and core themes in combination and/or with new or revised Strategic Plan to be submitted following approval of the Board of Regents of the Strategic Plan.

## **Enforcement:**

Responsibility for the enforcement of this policy and procedure resides with the College President. The Executive Leadership Team and all other faculty and staff are responsible for adherence to this policy and procedure. The SVPSIAS/ALO serves as the institutional point of contact for notification of changes to NWCCU and is charged with the responsibility to report substantive changes in a timely manner. No substantive change can be implemented until a letter of approval or an acceptance of notification is received from NWCCU. Submission of information to NWCCU can only be accomplished based on open communication and adherence by all appropriate departments, divisions and individuals. Individuals implementing changes not reported and/or approved will be subject to appropriate personnel action.

#### **Review:**

The Accreditation/Compliance Committee will initiate a review of this process each year in June to evaluate how the process is working and to revise procedures for improvement, if necessary.

#### **Resources**

1. Board of Regents, Handbook, Title 4, Chapter 14

2. Nevada System of Higher Education, Procedures & Guidelines Manual, Chapter 6

3. College of Southern Nevada, Curriculum Committee Policy, December 14, 2010

4. Northwest Commission on Colleges and Universities Eligibility Requirements <u>http://www.nwccu.org/accreditation/eligibility-requirements/</u>

**5.** Northwest Commission on Colleges and Universities Accreditation Standards <a href="http://www.nwccu.org/accreditation/standards-policies/standards/">http://www.nwccu.org/accreditation/standards-policies/standards/</a>

**6.** Northwest Commission on Colleges and Universities *Substantive Change Policy* (2018)

http://www.nwccu.org/wp-content/uploads/2018/06/Substantive-Change-Policy-2018.pdf

#### **Signatures**

Recommended by:

Not reviewed by Faculty Senate Signature Date Faculty Senate Chair Recommended by: /s/Patty Charlton 4/24/17 **CSN Senior Vice President** Date **Reviewed for Legal Sufficiency:** /s/Richard L. Hinckley\_ 4/24/17\_ General Counsel Date Approved by: /s/Michael D. Richards 4/24/17 **CSN** President Date