

California State University Northridge

Guidelines Substantive Change, WASC, and You



The Issues In Brief:

- “Substantive change” is a WASC phrase most often used to indicate a **change in the location** at which a program is offered.
- If you would like to offer a credit program **more than 25 miles from the main campus** whether through traditional, in-person, on-site delivery or delivery via distance education technologies—substantive change is an issue.
- If you plan to offer **50% or more of the coursework** for a degree, credential, or credit certificate program more than 25 miles from the main campus, you must have the approval of the University and WASC in advance.
- To get WASC approval, a substantive change proposal must be prepared and submitted to WASC a minimum of five months before you expect to start recruiting for the program. Preparing the proposal and getting internal University approval can take from two to five additional months—so you must **start the process a minimum of seven to ten months before recruitment begins** (see Attachment A).
- The first step in any project that will take a credit program more than 25 miles from the main campus is to contact **Cynthia Rawitch, the University’s WASC representative at (818) 677-2969.**

California State University, Northridge WASC Substantive Change Summary Guidelines

INTRODUCTION

The University's "WASC Substantive Change Summary Guidelines" provides a brief introduction to the policies and procedures of the Western Association of Schools and Colleges (WASC) for the initiation of new sites or additional credit programs involving Substantive change. The guide also assists the reader with managing the approval process internally at California State University, Northridge (CSUN) and with preparing the proposal for substantive change. To these ends, the guide contains the following sections:

1. A Definition of Substantive Change—When is a Proposal Necessary?
2. Preliminary Approval of the Idea within CSUN
3. Proposal Content—What Should Be Included in a Proposal?
4. Final University Approval for the Full Proposal
5. Submitting the Full Proposal to WASC Following Final University Approval
6. Attachments:
 - A: Model Timeline
 - B: Proposal Content
 - C: WASC and Quality Assurance in Distance Learning
 - D: Preliminary Internal Approval Form—Idea Stage
 - E: Final Internal Approval Form—Full Proposal

Please note that the summary guide is not intended to replace the comprehensive directions provided in the *2005 WASC Substantive Change Manual*, available online at <http://www.wascweb.org/senior/2005SCManual.pdf>. Consulting the WASC manual is essential for preparing a proposal for substantive change. (Additional substantive change resource materials are available online at http://www.wascweb.org/senior/subchange_resources.htm.)

A Definition of Substantive Change—When is a Proposal Necessary?

The prior approval of the WASC Substantive Change Committee (OCSC) is required for a new site or additional program whenever substantive change occurs. In the *2005 WASC Substantive Change Manual*, available online at <http://www.wascweb.org/senior/2005SCManual.pdf>, WASC defines substantive change at an accredited or candidate institution as “*one that may significantly affect an institution’s quality, objectives, scope or control*” (p. 10; emphasis added).

The two most common instances of substantive change requiring WASC’s prior approval are the “25-mile rule” and the “50% rule.” Specifically, a proposal is necessary when 50% or more of a credit program (i.e., degree, credential, or certificate program) is offered more than 25 miles from the *home* campus, whether face-to-face instruction or distance learning technologies are involved.

Moreover, any new site or additional program that an institution initiates *outside* of the WASC region must have prior approval from the OCSC Committee, including programs delivered via distance learning technologies. If a new site is initiated *within* the WASC region, then the 25-mile rule applies. If an additional program is initiated within the WASC region, prior approval is not necessary if it will be offered on campus or at an approved, existing site.

In addition to the 25-mile and 50% rules, WASC has developed a number of other working definitions of substantive change to assist institutions with interpreting its policies. These working definitions involve degree programs, distance learning, program location and length (i.e., credit hours), and institutional purpose and control. Please consult the *2005 WASC Substantive Change Manual*, available online at <http://www.wascweb.org/senior/2005SCManual.pdf>, for the most current details. If unclear whether or not a program constitutes substantive change, contact Dr. Cynthia Rawitch, CSUN’s WASC liaison officer.

NOTE: CSUN prefers that a proposed program not be publicly announced, publicized, or marketed prior to WASC Substantive Change Committee approval. WASC, however, would permit the circulation of marketing materials provided that they clearly state that the program is subject to prior approval. WASC also applies this stipulation to the signing of contracts or memoranda of understanding (see the *2005 WASC Substantive Change Manual*, p. 31). In any case, students may not be formally admitted to a program without its first being approved by the WASC Substantive Change Committee.

Preliminary Approval of the Idea within CSUN

This document guides the reader through the two stages of internal approval within California State University, Northridge (CSUN) for programs involving Substantive change, namely:

1. the idea stage—preliminary University approval, and
2. the full proposal stage—final University approval.

Keep in mind that approval of the program and approval of the substantive change may be two different processes, varying not only in purpose but also in length. If the program already exists within the University, the approval process will be faster and easier than if the program is a new creation. Whether new or existing, the program must first be introduced and approved through the normal University procedures. For substantive change approvals, follow the guidelines in this document. A model timeline is provided in **Attachment A** for your reference.

Since offering 50% or more of a program more than 25 miles from the home campus often involves the commitment of additional resources and services (including those from academic units other than the unit planning the program), one must first secure internal approval for the idea before developing a full proposal for WASC substantive change approval. The starting point for the internal CSUN approval process for substantive change is always a conversation with Cynthia Rawitch.

At the idea stage, before time is invested in preparing a full proposal, obtain appropriate guidance and gain the necessary support and approval by preparing a two-page summary of your idea. The summary should address the following:

- Briefly describe the program in question.
- State whether the program already exists within the University, whether it exists but will be modified, or whether it will be created in whole or in part. If the program is a new creation, it is strongly suggested that you have preliminary conversations with your college curriculum committee and then with the appropriate faculty senate committees: Educational Policy Committee (for undergraduate programs) or the Graduate Studies Committee. One of these two standing committees must formally approve any new or modified offering involving substantive change in the same manner as any other new or modified course or program is approved.
- Why do you wish to offer the program more than 25 miles from the main campus—what is the need, who will be served, why is this important?
- How will the program be delivered, and at what site(s) will it be delivered?
- What support services will be required for these distant students—financial aid, registration, library access, counseling, credential preparation services, career guidance, computer support, etc.?

- What program costs do you foresee that would exceed the cost of offering the program on the campus—instruction, travel, space rental, converting the program for delivery using educational technologies, etc.?
- Will your program be supported by the general fund or will it be a self-support program?

With this two-page summary, please attach the model “Preliminary Internal Approval Form—Idea Stage” which is included with this guide (see **Attachment D**). Be sure to indicate whether the fiscal basis for the program is to be the general fund or self-support mode. **NOTE: It is important to obtain the approval signatures on the form in the order in which they are requested (see below).**

For programs to be supported by the general fund, the necessary approval signatures and their order is:

1. Cynthia Rawitch, CSUN’s WASC liaison officer
2. The Department Chair
3. The College Dean
4. The Provost

For programs planned to be self-support, the necessary approval signatures and their order is:

1. Cynthia Rawitch, CSUN’s WASC liaison officer
2. The Department Chair
3. The College Dean
4. The Dean of The Roland Tseng College of Extended Learning
5. The Provost

For self-support programs, the early approval of the dean of The Tseng College of Extended Learning is required. If a program is approved for self-support funding, The Tseng College will collaborate with the proposing academic unit to plan the program, develop a detailed budget, and plan its successful marketing and delivery, including relevant student services. Also, for approved self-support programs, assistance with proposal preparation is also available from the Tseng College.

Once the two-page summary idea receives all the necessary approvals, return to either Cynthia Rawitch or the dean of The Tseng College, depending on the fiscal basis of the program. If the proposed program is to be supported by the general fund, return to Cynthia Rawitch for guidance on preparing your full proposal.

Following Preliminary Approval within the University Proposal Content—What Should Be Included in a Proposal?

After preliminary University approval for your idea has been obtained, prepare the WASC Substantive change proposal for submission to the Substantive Change Committee of WASC. Keep in mind that successful proposals to the WASC committee clearly demonstrate institutional readiness to implement and sustain the proposed change in terms of appropriate planning and approvals, resources, and quality assurances. Proposals should also relate the program to the institution's mission, describe the nature of the proposed change, and justify the need for the change.

Attachment B of this document outlines the proposal content that addresses some of the more challenging questions posed by WASC. If the program you are proposing will rely on delivery using educational technologies, also see **Attachment C** with this guide. Complete instructions for preparing the proposal appear in the *WASC 2005 WASC Substantive Change Manual*, available online at <http://www.wascweb.org/senior/2005SCManual.pdf>.

Obtaining Final University Approval for the Full Proposal

As soon as a solid draft of the WASC proposal has been prepared, the proposal must be reviewed and approved within the University before it is submitted to WASC. Use the model "Final Internal Approval Form—Full Proposal" provided here (see **Attachment E** with this guide). Make sure that approvals are gathered in the order in which they appear on the document. Also indicate whether the fiscal basis for the program is to be the general fund or the self-support mode.

For general-fund supported programs, approval of the final proposal is required from:

1. The college curriculum committee
2. The University Faculty Senate Educational Policy Committee for undergraduate programs or the Graduate Studies Committee for graduate programs
3. The department chair
4. The college dean
5. Cynthia Rawitch (who will also seek feedback from others in the provost's office)
6. The provost (who will determine if presidential approval is needed).

For self-support programs, the University approvals required and their order are:

1. The college curriculum committee
2. Either the University Faculty Senate Educational Policy Committee for undergraduate programs or the Graduate Studies Committee for graduate programs
3. The department chair
4. The college dean
5. The dean of the Tseng College of Extended Learning
6. Cynthia Rawitch (who will also seek feedback from others in the provost's office), CSUN's WASC liaison officer
7. The provost (who will determine if presidential approval is needed).

Allow five weeks for this approval phase (with a firm minimum of **three weeks**) for the CSUN readers to review and return the proposal. Then make the revisions the readers suggest, and prepare the proposal for photocopying and delivery. Please refer to the timeline in **Attachment A** of this guide for more information.

NOTE: *In some cases, it may also be necessary to secure the approval of the CSU Board of Trustees before submitting a proposal to WASC (see the 2005 WASC Substantive Change Manual, p. 34).*

Submitting the Full Proposal to WASC Following Final University Approval

As soon as the full proposal for the new site or program has received internal University approval, again contact Margaret Fieweger, CSUN's WASC accreditation liaison officer. Cynthia Rawitch will initiate the WASC Substantive Change (OCSC) approval process and expedite the steps below:

1. Through Cynthia Rawitch, reserve a place on the appropriate upcoming WASC OCSC Committee meeting agenda. The sooner this is done, the better; OCSC agendas fill up quickly. (This can be done after you have approval for the preliminary proposal and when you are certain that the final proposal can be finished in time to obtain all the necessary University approvals in advance of the WASC target date. Cynthia Rawitch can review the options with you on the WASC meeting schedule.)

NOTE: *When selecting a WASC meeting target date, keep in mind that the lead individuals involved in the proposed program will be expected to attend the meeting. Be sure others who will need to attend know about the date and reserve it in their calendars early. The meetings often require travel and sometimes an overnight stay.*

2. With Cynthia Rawitch's guidance, prepare a follow-up letter notifying the WASC OCSC Committee of your intent to submit a proposal. This one-page letter, which will be sent to WASC from the provost, should:
 - request a meeting date for the Committee to consider the proposal;
 - briefly describe the nature of the proposed substantive change, including delivery mode if distance learning is involved;
 - state the date by which the Committee will receive the proposal.

Cynthia Rawitch will help you polish the letter in light of WASC preferences; she will also forward it to the provost for signature and mailing. WASC must receive the letter at least **five weeks** prior to the OCSC Committee meeting date at which the proposal will be considered.

ATTACHMENT A

MODEL TIMELINE FOR PREPARING AND SUBMITTING A WASC SUBSTANTIVE CHANGE PROPOSAL

WASC requires institutions to allow sufficient planning time prior to implementation of a proposed substantive change for the WASC Substantive Change (OCSC) Committee to approve a proposal. The entire process may require anywhere from **9 to 22 months** to complete, from the idea stage through all approvals to program inauguration. The internal University approval process itself may require **2 to 15 months**, depending on the nature of the program. An additional **7 months** is required for developing the full proposal, submitting it to WASC, and obtaining the Substantive Change Committee's prior approval. "Prior approval" means that WASC's approval must be secured at least 90 days prior to the date on which you plan to inaugurate the program and begin recruiting students for it. Proposals must therefore be submitted to WASC at least 120 days prior to the date you hope to begin recruitment.¹

The length of time required for the **internal University approval** process will vary from approximately 2 to 15 months, depending on the nature of the program. For example, a proposed change in a program currently **existing** in the University may take only 2 months while a **new** degree program could require 6 to 15 months for approvals from the college's curriculum committee and either the Educational Policy Committee or the Graduate Studies Committee. Other factors may also complicate the approval process, such as any concerns arising in regard to cross-disciplinary or cross-institutional programs, and by the level of discussion prompted by the nature of the program proposed. The time of year that approval is sought—over summer, for example—may also slow the process.

The entire process for WASC approval of new sites or additional programs involving substantive change can be divided into three stages:

1. the idea stage with preliminary internal University approvals,
2. the full proposal stage with final internal University approvals, and
3. the WASC submission and approval stage.

The timeline provided in this attachment describes the main tasks in each stage and approximately when they should be accomplished.

A good strategy for program planning is to work backwards from the date you wish to begin recruitment for the program. To prepare the fully developed WASC proposal, allow a minimum of **7 months** from the date on which the proposed change receives internal CSUN approval to the date on which you hope to start recruitment for the program in question. The proposal must be submitted to WASC at least 120 days prior to the anticipated program inauguration date.

¹ The University prefers that WASC's prior approval be obtained before students are recruited for the program. The *WASC Substantive Change Application Manual*, however, uses the program inauguration date as the reference point for managing time. See note on page ## of this guide.

The model timeline in the table below illustrates a hypothetical, 12-month chronology of activities leading up to proposal submission. The timeline is based on a proposed substantive change to an *existing* University program for which recruitment would begin in the fall semester, 2002. It is assumed that the preliminary internal approval at CSUN would take place in 3 months during the previous spring 2001 semester.

HYPOTHETICAL 12-MONTH TIMELINE

DATE	ACTIVITY
Allow 2 to 15 months e.g., September 3, 2001 to November 21, 2001 (3 months)	<u>IDEA STAGE WITH PRELIMINARY INTERNAL UNIVERSITY APPROVALS</u> Develop idea. Obtain advice and support. Write two-page summary describing idea. Secure preliminary University approvals by completing "Preliminary Internal Approval Form—Idea Stage" in Attachment D. Obtain signatures requested on form.
Allow 6 weeks for drafting proposal e.g., November 26, 2001 to February 1, 2002 (extra weeks for winter break)	<u>FULL PROPOSAL STAGE WITH INTERNAL UNIVERSITY APPROVALS</u> Concurrent activities: <ul style="list-style-type: none"> • Draft full WASC proposal. • Select WASC OCSC Committee meeting date for submitting proposal (in this case, May 16, 2002 has been chosen). Notify Margaret Fieweger of the date. • Prepare letter of intent to submit a proposal and requesting a place on the WASC OCSC meeting agenda as soon as you are certain of your timeline for completing the proposal and securing internal approval. (See below.)
Allow 3-5 weeks for review and approvals e.g., February 4 to March 1, 2002 (4 weeks)	<ul style="list-style-type: none"> • CSUN reviewers read proposal and return with comments. • Secure final University approvals by completing "Final Internal Approval Form—Full Proposal" in Attachment E. Obtain signatures requested on form
Allow 3 days e.g., February 4 to February 6, 2002 Allow M. Fieweger at least 1 week to review and send letter. e.g., February 6 to February 13, 2002 e.g., WASC must receive letter of intent by April 11, 2002	<ul style="list-style-type: none"> • Prepare a letter of intent to submit proposal as soon as you are certain of your timeline for completing the proposal and securing internal approval. • Route draft of letter of intent to Margaret Fieweger for revision, approval, and provost's signature. She will mail the letter. <p>Note: WASC must receive letter by April 11, 2002, at least 5 weeks before the OCSC Committee meeting at which the proposal will be considered (in this case, the meeting of May 16, 2002). The sooner, the better since WASC OCSC agendas fill up quickly.</p>

Allow 1 week e.g., March 4 to March 8, 2002	Concurrent activities: <ul style="list-style-type: none"> • Revise proposal and prepare it for photocopying. • Prepare proposal transmittal letter addressed to chair of the WASC OCSC Committee.
Allow 1 week e.g., March 11 to March 15, 2002	Concurrent activities: <ul style="list-style-type: none"> • Have 8 photocopies of proposal made and bound. (Make extra copies for CSUN distribution.) • Prepare proposal copies (with any supplements) for delivery. • Request college or department check for appropriate WASC application fee (either \$500 or \$1,000). Fee must accompany proposal when submitted. (Submit check request to CSUN's Financial and Administrative Services no later than Monday of the week the check is needed. Checks are usually released on Fridays.)
Allow 2 weeks for delivery e.g., March 18 to March 29, 2002	Mail to WASC OCSC Committee office: 8 copies of proposal, transmittal letter, check, and any necessary supplemental materials.
DUE DATE: By April 11, 2002	WASC must receive letter of intent by this date at the latest. (See above.)
DUE DATE: By April 22, 2002 for the WASC OCSC meeting of May 16, 2002	WASC must receive proposals by this date, which is at least 3 weeks before the Committee meets. Reminder: "Proposals for prior approval must be submitted to the Committee at least 120 days in advance of the date that the change would become operative."
On May 16, 2002	Key faculty and deans from CSUN attend WASC OCSC Committee meeting to discuss the proposal, and answer questions raised by the Committee. Expect a one-hour discussion.
By May 27, 2002	WASC approves or declines proposal and notifies institution at least 90 days before projected site or program inauguration date.
August 26, 2002	New site or additional program is inaugurated if approved, and student recruitment may begin.