




Substantive Change Applications

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COUNCIL ON OCCUPATIONAL EDUCATION

2021 COE ANNUAL MEETING (VIA WEBINAR)

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What are Substantive Changes?

Changes which significantly alter an institution's objective, scope, programs, location, standing with another nationally recognized accrediting agency or state/federal agency, financial stability, ownership, or control.

Types of Substantive Changes

- ▶ PLANNED
 - ▶ Must be applied for and approved by COE **before** the change takes place
- ▶ UNPLANNED
 - ▶ COE must be notified **within 5 days** after the change occurs
 - ▶ Following notification, an application for approval of the change must be submitted within 30 days

NOTE: Schools in candidate status may not apply for any substantive changes.

Planned Institutional Changes

- ▶ Name Change
- ▶ Location Change
- ▶ Change of Ownership/Control
- ▶ Merger of COE schools
- ▶ New Branch
- ▶ New Extension
- ▶ New Extended Classroom
- ▶ New Instructional Service Center
- ▶ Campus Relationship Change
- ▶ Change of a Branch to a New Main Campus
- ▶ Campus Closure

Please Note:

- ▶ Change of Location: no matter if it's across the country or across the street, a change of address is a "change of location"
- ▶ Campus Relationship Change: when a main campus and a branch campus switch identities ("flip-flop")
- ▶ Branch-to-Main: when a branch campus becomes its own stand-alone institution with no operational ties to its old main campus
- ▶ Change of Ownership: "Warning, Will Robinson!" Contact the Council as soon as you even think you might sell your school to another party; this also includes changing the type of business entity with existing owners.

Additional Campus

- ▶ Branch
- ▶ Extension
- ▶ Extended Classroom
- ▶ Instructional Service Center

See *Handbook of Accreditation, 2021 Edition*, pp. 38-40

Additional Space

- ▶ A classroom or lab location within a quarter mile of an approved main campus or non-main campus site
- ▶ Considered to be a part of the nearby main campus or non-main campus site
- ▶ Submit a letter to the Council with the address and validation that it is within ¼ mile of an approved campus
- ▶ No application, no visit, no Commission approval required
- ▶ It is not considered to be a separate campus

Internship sites, clinical sites, externship sites and apprenticeship sites are not considered by the Commission to be “campuses” of the institution. These locations do not require (and will not receive) approval as non-main campus sites of an accredited institution.

Planned Programmatic Changes

- ▶ New Program
- ▶ Initial Associate Degree
- ▶ Change in Existing Program
- ▶ Change of Programmatic Scope
- ▶ Program Deletion
- ▶ Program Replication/Relocation
- ▶ Institutional Distance Education
- ▶ Teach-out (internal)
- ▶ Teach-out (with another institution)
- ▶ Clock Hour/Credit Hour Conversion

Unplanned Events

- ▶ Loss of Licensure or State Approval
- ▶ Conditional or Adverse Status with Another Accreditor or Authorizing Agency
- ▶ Significant Loss of Funding or Bankruptcy
- ▶ Substantial disruption of classes
- ▶ Eviction or unplanned change of location
- ▶ Teach-out of another institution

Institutions must notify the Council within 5 days of these events.

Most Substantive Changes Require:

- ▶ Application
- ▶ State approval
- ▶ Fee
- ▶ Commission approval
- ▶ Site visit

**Refer to *Handbook of Accreditation*,
2021 Edition, pp. 35-36**

The Approval Process

- ▶ Letter of Intent of Planned Change at least 30 days before application is submitted
- ▶ Application is due to COE 90 days in advance of implementation
- ▶ Initial approval by Commission in MAR, JUN, SEP or DEC
- ▶ Site visit within 180 days of initial approval
- ▶ Final approval in MAR, JUN, SEP or DEC

Reminder:

Substantive changes
cannot be implemented
until the Commission
grants initial approval to
the change application

Application Due Dates prior to 2022 Commission Meetings

- ▶ JAN 20 (for MAR meeting)
- ▶ APR 14 (for JUN meeting)
- ▶ AUG 4 (for SEP meeting)
- ▶ OCT 27 (for DEC meeting)

Due dates are firm

NOTICE:

- ▶ Substantive changes must be implemented at the time of the Site Visit
- ▶ Substantive changes must be implemented within 180 days of the date of initial approval
- ▶ Failure to implement the change within 180 days of initial approval will result in a penalty of \$1500 and revocation of the letter of initial approval

The Approval Process (continued)

- ▶ Team Report sent to COE Executive Director and Institution
- ▶ Institution's Response (if necessary)
- ▶ Commission Action
 - ▶ Approve
 - ▶ Defer
 - ▶ Deny
 - ▶ (Appeal option in case of denial)
- ▶ Letter of Final Approval

Planned Substantive Changes will not be Approved:

- ▶ If any Unplanned Substantive Change has not been granted final Commission approval
- ▶ If any Violation Status is Pending
- ▶ If an Appeal is Pending
- ▶ If a COE Invoice is Past Due
- ▶ From 6 months prior to an accreditation visit until the date the Commission grants reaffirmation of accreditation

NOTE:

Final approval for planned substantive changes requiring site visits must be granted before additional applications for changes requiring site visits will be approved.

Pointers for Quick COE Approval

- ▶ Send one hard copy and a flash drive with a PDF of the application
- ▶ Enclose correct payment amount
(application fee *plus* site visit deposit and dues, if applicable)
- ▶ Send amended PDF file if changes or additions are required by the Council
- ▶ Refer to “*Directions for Preparing and Submitting a Substantive Change Application*” in each application

A Word to the Wise



Unapproved sites and programs can lead to serious financial paybacks.

For More Information...

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