

VIRGINIA MILITARY INSTITUTE  
Lexington, Virginia

GENERAL ORDER)  
NUMBER 84)

9 March 2023

**The Virginia Military Institute's Policy on Substantive Change**

**Purpose Statement.** This policy exists specifically to establish, clarify and communicate the requirement that all changes to Virginia Military Institute (VMI) that are deemed to be "substantive" must be approved by the Superintendent and Board of Visitors, with subsequent notification to and/or approval by the Southern Association of Schools and Colleges Commission on Colleges (SACSCOC), VMI's regional accrediting body. The policy further requires, when appropriate, that VMI report to, and gain prior approval from, the State Council of Higher Education for Virginia (SCHEV) for substantive change proposals. The requirements of both agencies must be met; compliance with one does not constitute compliance with the other. This policy is primarily designed to address academic programs and curricular issues; although other defined substantive changes are also covered.

**Applicability.** This policy applies to all VMI staff and faculty who can initiate, review, approve and allocate resources to any changes, including those to academic and non-academic programs and activities that may be considered a substantive change according to SACSCOC Policy for Substantive Changes for Accredited Institutions. Each individual hereby designated is required to be familiar and comply with this policy.

Within academic areas, proposals for substantive change can originate with individuals or groups of faculty members, Department Committees, Department Heads, the Academic Board (and its Sub-Committees), the Associate Deans, or any other area reporting to the Deputy Superintendent for Academics and Dean of the Faculty.

In other areas, potential substantive changes may arise in individual units, among supervisors in each area or with VMI's Institute Planning Committee (IPC). Further, the need for a potential substantive change may come to the attention of the Superintendent, the Chief of Staff, or the Secretary to the Board of Visitors and Executive Assistant to the Superintendent.

**Institutional Obligations**

In accordance with the requirements for regional accreditation, VMI is required to notify SACSCOC and SCHEV of changes in accordance with the substantive change policy, and prior to the initiation of proposed changes.

1. The Superintendent is responsible for ensuring Institute-wide compliance with VMI's substantive change policy. The Chief of Staff is further responsible and accountable for the monitoring and timely reporting of all actions that may trigger a substantive change notification and will ensure that each proposal for substantive change will follow the procedures outlined herein.

2. The Institute's SACSCOC Liaison will coordinate the exchange of required documents and notifications between VMI and SACSCOC. A member of the Dean's staff will coordinate the exchange of documentation between VMI and SCHEV.
3. Supervisors are responsible for bringing forward any potential substantive changes in their respective areas.
4. The Superintendent, in concert with the Deputy Superintendent for Academics and Dean of the Faculty, is responsible for the accuracy of all information submitted to SACSCOC and for ensuring ongoing compliance with SACSCOC standards, policies, and procedures beyond reaffirmation. The Superintendent is also responsible for oversight and final reporting of substantive changes to SACSCOC.
5. If an academic program, Institute unit, or officer initiates a substantive change without following the procedures outlined in this policy, the Superintendent or Deputy Superintendent for Academics and Dean of Faculty may direct the immediate cancellation or cessation of that change. In areas outside of academics the same sanction may be applied by the Superintendent or relevant Supervisor.

**Definition of Substantive Change.** Substantive change is a significant modification or expansion of the nature and scope of an accredited institution.

Institute-level substantive changes includes:

- Substantially changing the established mission or objectives of an institution or its programs.
- Changing the legal status, form of control, or ownership of an institution.
- Changing the governance of an institution.
- Merging / consolidating two or more institutions or entities.
- Acquiring another institution or any program or location of another institution.
- Relocating an institution or an off-campus instructional site of an institution (including a branch campus).
- Offering courses or programs at a higher or lower degree level than currently authorized.
- Adding graduate programs at an institution previously offering only undergraduate programs (including degrees, diplomas, certificates, and other for-credit credential).
- Changing the way an institution measures student progress, whether in clock hours or credit-hours; semesters, trimesters, or quarters; or time-based or non-time-based methods or measures.
- Adding a program that is a significant departure from the existing programs, or method of delivery, from those offered when the institution was last evaluated.
- Initiating programs by distance education or correspondence courses.
- Adding an additional method of delivery to a currently offered program.
- Entering into a cooperative academic arrangement.
- Entering into a written arrangement under 34 C.F.R. § 668.5 under which an institution or organization not certified to participate in the title IV Higher Education Act (HEA) programs offers less than 25% (notification) or 25-50% (approval) of one or more of the accredited institution's educational programs. An agreement offering more than 50% of one or more of an institution's programs is prohibited by federal regulation.

- Substantially increase or decreasing the number of clock hours or credit hours awarded or competencies demonstrated, or an increase in the level of credential awarded, for successful completion of one or more programs.
- Adding competency-based education programs.
- Adding each competency-based education program by direct assessment.
- Adding programs with completion pathways that recognize and accommodate a student's prior or existing knowledge or competency.
- Awarding dual or joint academic awards.
- Re-opening a previously closed program or off-campus instructional site.
- Adding a new off-campus instructional site/additional location including a branch campus.
- Adding a permanent location at a site at which an institution is conducting a teach-out program for students of another institution that has ceased operating before all students have completed their program of study.
- Closing an institution, a program, a method of delivery, an off-campus instructional site, or a program at an off-campus instructional site.

### **Substantive Change Procedures**

1. SACSCOC's substantive change policy is posted at:  
<https://sacscoc.org/app/uploads/2019/08/SubstantiveChange.pdf>
2. To ensure compliance, Department Heads and Senior Executives are responsible for completing the attached checklist in the early stages of any proposal (e.g., new degree programs) and submitting it to the Institute's SACSCOC Liaison to determine whether proposal constitutes a substantive change.
3. If the proposal is, in fact, deemed substantive, the following process will take place:

### **Proposal Submission/Approval Path**

- Department Curriculum Committee submits to the Dean a substantive checklist w/ written description of the proposal
- Deputy Superintendent for Academics and Dean of the Faculty reviews and comments
- Dean forwards proposal to the Academic Planning and Review Committee (APRC). The APRC examines proposal to ensure it is consistent with VMI's Mission, and VMI's Academic Program Goals and Objectives
- The APRC returns proposal to the Dean, who forwards it to the Curriculum Instruction Committee (CIC). The CIC will examine the proposal and measure its content for: appropriateness, feasibility, cost, timeline, faculty qualifications and rosters, assessment methodology and other important considerations
- The Curriculum Instruction Committee presents proposal for two readings at the Academic Board
- If recommended by the Academic Board, the proposal is forwarded to the Institute Planning Committee (IPC)
- If recommended by the IPC, the proposal is forwarded through the Chief of Staff to the

Superintendent for submission to the Board of Visitors (BoV)

- The Academic Affairs Committee of the BoV reviews and recommends; the BoV votes on approval.
- The Institute's SACSCOC Liaison will submit the proposal documents to SACSCOC as appropriate. A member of the Dean's staff will coordinate the exchange of documentation between VMI and SCHEV
- The SACSCOC Liaison will submit to the Institute's assigned SACSCOC Vice President a letter of notification that summarizes the proposed change and provides the intended implementation date
- In the case of a substantive change proposal that is non-academic program related, the Chief of Staff will submit the change proposal directly to the IPC whose recommendation is forwarded to the Superintendent for his recommendation to the Board of Visitors.

FOR THE SUPERINTENDENT:

John M. Young  
Lieutenant Colonel, Virginia Militia  
Chief of Staff

OPR: OAIR

**Substantive Change Checklist:**

<b>Question:</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>
Does the proposal involve a change in the established mission or objectives of the institution?			
Does the proposal involve any change in legal status, form of control, or ownership of the institution?			
Does the proposal require the addition of courses or programs that represent a significant departure, either in content or method of delivery, from those that were offered when the institution was last evaluated?			
Does the proposal initiate programs by distance education or correspondence courses?			
Does the proposal add an additional method or delivery to a currently offered program?			
Will there be an addition of courses or programs of study at a degree or credential level different from that which is included in the institution's current accreditation or reaffirmation?			
Will there be a change from clock hours to credit hours?			
Will there be a substantial increase in the number of clock or credit hours awarded for successful completion of a program?			
Does the proposal add competency-based education program (including by direct assessment and/or by adding completion pathways that recognize and accommodate students' prior knowledge or competency)?			
Does the proposal require the establishment of an additional location geographically apart from the main campus at which the institution offers at least 50% of an educational program?			
Does the proposal require the establishment or reopening of a branch campus?			
Does the proposal require closing a program, a method of delivery, off-campus site, branch campus or institution?			
Will there be a need to enter into a collaborative academic arrangement that includes only the initiation of a dual or joint academic program with another institution?			
Will the proposal involve acquiring another institution or a program or location of another institution?			
Does the proposal involve a permanent location at a site where the institution is conducting a teach-out program for a closed institution?			
Does the proposal involve entering into a contract by which an entity not eligible for Title IV funding offers 25% or more of one or more of the accredited institution's programs?			

Reviewed and Approved by the Institute Executive Committee

Reviewed and Approved by the Academic Board

Approved by the Board of Visitors as appropriate