3.12.1 The institution notifies the Commission of changes in accordance with the substantive change policy and, when required, seeks approval prior to the initiation of changes. (Substantive change)

**Compliance Status:** Non Compliance

### Narrative

**Action Plan**

1. In preparing the Compliance Certification Report, Texas A&M University-Corpus Christi discovered multiple instances of possible substantive changes. As detailed in the narrative below, the University has notified SACS of those possible substantive changes. Currently, the University is waiting for responses on three possible substantive changes: (a) the use of the Islander Art Gallery in the Hamlin Center as an off-campus site for teaching studio painting courses, (b) a minor support role in a cooperative Ph.D. in Hispanic studies, and (c) participation in the Texas Electronic Coalition for Physics. The response from SACS will be available for the visiting committee; and the University will implement any recommendations that SACS may make before the visit.

2. In writing the response to Principle 3.12.1, the University did a second audit of distance education courses and discovered that the higher education cognate (or career specialization) within the Ed.D. in educational leadership program is being delivered partially online. It is believed that students in this cognate can receive between 25 percent and 49 percent of their course work online or through other distance education delivery methods. The University is continuing to investigate the situation and is preparing a notification letter for SACS. The notification letter will be sent to SACS by September 30, 2009. The response from SACS will be available for the visiting committee; and the University will implement any recommendations that SACS may make before the visit.

**Narrative**

Texas A&M University-Corpus Christi recognizes the importance of the commission's substantive-change policy [1] and understands that reporting substantive changes in a timely manner is essential to ensure compliance with the policy and with federal regulations. The institution is committed to complying with the substantive change policy and has provided notification concerning many anticipated changes. Unfortunately, certain changes have not been reported in a timely manner. Some of these unreported changes were identified during the 2008 readiness audit conducted prior to the preparation of the Compliance Certification Report. Others were discovered during the process of drafting the report. The University regrets the delay in notification and is working to correct these problems and to ensure that they will not reoccur.

Texas A&M-Corpus Christi's last SACS reaffirmation of accreditation review was in 2000. At the December 2000 meeting, the Commission on Colleges reaffirmed accreditation and requested a follow-up report addressing the visiting committee's recommendations. In December 2001, the commission requested a second follow-up report. After reviewing this report in December 2002, the commission requested no additional information.

Since 2001, A&M-Corpus Christi has notified SACS of a variety of substantive and nonsubstantive...
Notification of Changes: 2001 through 2007

In January 2001, during the reaffirmation process, A&M-Corpus Christi notified SACS of its intent to implement a doctor of education (Ed.D.) in school counseling. The institution already offered a joint Ed.D. in educational leadership with Texas A&M University-Kingsville. In a letter dated January 18, 2001, Dr. Tom Benberg, associate executive director of the Commission on Colleges, indicated that offering a second major under the Ed.D. degree "does not appear" to "constitute a substantive change." However, he requested documentation demonstrating that the new program would fully comply with SACS standards because issues concerning the existing doctoral program had emerged during the reaffirmation review[3]. In August 2001, Provost Sandra Harper submitted the "Report to the Southern Association of Schools: Texas A&M University-Corpus Christi Doctoral Program in School Counseling[4]."

On October 17, 2001, Dr. James Rogers, executive director of the Commission on Colleges, responded that the documentation addressed the issues and that no further information was requested[5].

On March 28, 2003, President Robert Furgason notified Dr. Rogers of the institution's intent to offer the generic nursing major in the bachelor of science in nursing (B.S.N.) program through e-Line (Electronic Learning in Nursing Education), an online delivery method. The R.N.-B.S.N. major was already offered through distance technology[6]. In his response of May 27, 2003, Dr. Rogers said, "The online delivery medium does not change program mission and goals, does not increase or decrease program length, does not add a transition or bridging option, and does not add alternative programs of study... . Because you are not initiating significant change in existing technology-based delivery systems in distance learning, we require no further information from you. We shall include this program and delivery mode within the scope of accreditation previously granted[7]."

On July 1, 2004, President Furgason notified Dr. Rogers of plans to implement an Ed.D. program in curriculum and instruction, a change he did not consider to be substantive[8]. On July 19, 2004, Dr. Rogers wrote, "Since this program does not represent a significant departure from your current offerings, and is consistent with the mission of the institution, we require no further information. It shall be included within the scope of your accreditation[9]."

On September 1, 2004, President Furgason notified Dr. Rogers of two changes[10]:

- A title change of the existing Ed.D. in school counseling to a Ph.D. in counselor education to reflect its research-based curriculum. (Dr. Furgason believed this change to be nonsubstantive from a SACS perspective.)
- The intent to implement a Ph.D. in coastal and marine system science in fall 2005 (a substantive change). SACS' approval of the Ph.D. in coastal and marine system science (a fourth doctoral degree program) could also advance the institution from Level V to Level VI accreditation.

Regarding the title change, Dr. Rogers requested only the date of implementation, which was provided on November 16, 2004[11]. Dr. Rogers acknowledged notification of the date on January 4, 2005[12].

Provost Harper submitted the prospectus for the Ph.D. in coastal and marine system science on May 24, 2005[13]. On January 30, 2006, Dr. Belle Wheelan, president of the Commission on Colleges, requested additional information on program assessment. She said, "We approve the proposal, contingent upon a satisfactory response to our request for additional information, and shall include it within the scope of accreditation previously granted. Since this will be the fourth doctoral program offered by your institution, the institution will be advanced from Level V to Level VI[14]." Interim
Provost Robert Kirby submitted the requested information on February 24, 2006 [15]. In her reply of March 24, 2006, Dr. Wheelan said that the information satisfactorily addressed the issues, resulting in the removal of the contingency that had been applied to the approval of the program [16].

On October 12, 2006, Provost Virginia Wheeless notified Dr. Wheelan that the institution had received approval from the Texas Higher Education Coordinating Board to offer the master of science (M.S.) degree with a major in kinesiology [17]. A copy of the degree program proposal and other documentation was provided. On November 15, 2006, Dr. Wheelan wrote, "Since this is not a significant departure from your approved programs, we accept the notification and require no further information from you [18]."

Readiness Audit for SACS Compliance Certification Report and Consultation with SACS Staff

In spring 2008, A&M-Corpus Christi conducted a readiness audit in preparation for completing the compliance certification report for the 2010 SACS reaffirmation of accreditation review. Numerous subcommittees participated in this project. The Subcommittee on Accreditation liaison was asked to review the SACS substantive-change policy, determine what documentation existed to show compliance with the standard, and identify possible compliance issues and documentation issues. Christine Shupala, coordinator of the SACS Compliance Report on campus, worked with the subcommittee on this project. Copies of the meeting notes are included in the documentation for this principle [19] [20] [21].

The subcommittee chair gathered documentation from the president's office and the provost's office regarding past notification of substantive changes. Subcommittee members requested information from the college deans about past and anticipated substantive changes in their colleges [22]. They also provided the deans with links to the SACS policy on substantive changes and related information on the SACS web site.

Based on the information received from the colleges and other sources, the subcommittee identified various past changes that appeared to require notification. Examples included the addition of the M.S. in geospatial surveying engineering in 2007 and its use of hybrid distance education methods, the delivery of a B.S.N. in nursing program to College Station by distance education for three years, the gradual phase out of the bachelor of science (B.S.) program in clinical laboratory science following the implementation of the B.S. program in biomedical sciences, and the increase in hours required for certain tracks within the M.S. in counseling.

Subcommittee members were less sure about certain other past changes. For example, the institution had long offered the master of science in nursing (M.S.N.) through distance education to several sites, using two-way interactive video as a primary electronic mode of delivery. Eventually online delivery replaced interactive video, eliminating the need for off-campus sites. Did the conversion from one type of electronic delivery to another type of electronic delivery represent a substantive change? If an approved distance education program converted from off-campus sites to online delivery, was that a substantive change? What was the meaning of "expanding at current degree level (significant departure from current programs)?" A common misperception on campus was that, for institutions accredited at Level V or VI, expanding at the "current degree level" referred to the expansion of programs at the doctoral level rather than expansion at all levels. Additionally, the subcommittee was unsure whether notification was required for the past implementation of bachelor's degrees if the new programs did not seem to be very different from previously existing degrees. Because college academic administrators also seemed unsure about certain requirements, a faculty member on the subcommittee suggested that the SACS staff be consulted. This conversation, however, did not occur before the completion of the subcommittee's report.
The report took the form of a matrix, which listed the existing documentation of compliance with the substantive change policy, listed contact offices for that documentation, and identified various compliance issues related to unreported changes [23]. Although the matrix did not identify all unreported changes, the readiness audit highlighted the need for a better understanding and awareness of the SACS policy on substantive changes in academic departments and offices throughout the campus, especially with regard to distance education and off-campus sites. Also, the readiness audit revealed the need for a better process or procedure to ensure compliance with the SACS requirements.

After attending a SACS workshop in summer 2008, Christine Shupala had the opportunity to ask Dr. Gerald Lord, vice president of the Commission on Colleges, specific questions raised by members of the subcommittee [24]. Dr. Lord confirmed that converting from video conferencing at off-campus sites to web-based delivery was a substantive change that should be reported to the commission. He clarified the meaning of "expanding at the current degree level," and confirmed that the institution should notify SACS about the previously implemented bachelor's degree programs even if it considered them to be nonsubstantive. Notification letters could include the institution's reasons for believing changes to be nonsubstantive. Dr. Lord discussed several characteristics of a nonsubstantive change, and he addressed issues related to the phasing out of programs. This information was very helpful to the institution. Also helpful were the SACS workshops on substantive change that University administrators attended.

**Notification of Changes: 2008 - the Present (July 2009)**
Below is a summary of the actions taken since fall 2008 to inform SACS about future changes and unreported past changes. Although some of the following changes are substantive, others were considered by the institution to be nonsubstantive. Copies of the notification letters and the replies from Dr. Wheelan are included in the documentation for the narrative.

**Prior Notification of Future Changes**
All new degree programs discussed below were approved by the appropriate campus review bodies and administrators, by the Board of Regents of The Texas A&M University System, and by the Texas Higher Education Coordinating Board.

On March 14, 2008, President Flavius Killebrew notified Dr. Wheelan of the institution's plans to implement Joint M.S. and Ph.D. degree programs in marine biology with Texas A&M University and Texas A&M University at Galveston [25]. Since the new program and the existing Ph.D. in coastal and marine system science would complement each other, the institution did not consider the new program to be a significant departure from current programs. The notification letter suggested, however, that the joint programs might fit into the substantive change category of "initiating programs/courses offered through contractual agreement or consortium." On May 6, 2008, Dr. Gerald Lord called Provost Anantha Babbili to request an addendum clarifying the role of the three institutions and confirming that only Texas A&M University and A&M-Corpus Christi would grant degrees in this program. On May 29, 2008, Dr. Babbili submitted the addendum [26], a copy of the degree proposal, and related information. On July 16, 2008, Dr. Wheelan accepted notification of the institution's intent to implement the program [27].

In a letter dated June 2, 2008, President Killebrew notified SACS of the institution's intent to implement the bachelor of applied science (BAS) degree in applied arts and sciences [28] and provided a copy of the degree program proposal. Dr. Wheelan accepted the notification on July 16, 2008 [27].

On December 18, 2008, President Killebrew notified Dr. Wheelan that the institution planned to offer the master of arts (M.A.) in communication beginning fall 2009 [29] and provided a copy of the degree proposal and related materials. In her response of March 9, 2009, Dr. Wheelan reported that the M.A.
proposal was approved [30].

In separate letters dated February 19, 2009, Dr. Killebrew notified Dr. Wheelan of the institution's intent to

- Implement the bachelor of science in mechanical engineering (B.S.M.E) degree program in fall 2009 [31]. (The degree proposal and related materials were provided to SACS.)
- Participate in a supporting role in a cooperative Ph.D. program in nursing science, beginning fall 2009, with Texas Woman's University. The degree-granting institution will be Texas Woman's University [32].
- Reclassify the existing Ed.D. in curriculum and instruction as a Ph.D. in curriculum and instruction to reflect the research emphasis of the program, a change that the institution does not consider to be substantive [33].

In her response dated April 14, 2009, Dr. Wheelan approved the B.S.M.E. program, accepted notification of the cooperative Ph.D. in nursing science, accepted notification of the reclassification of the doctorate in curriculum and instruction, and requested the effective date of the reclassification [34]. Dr. Killebrew provided the date (fall 2009) on May 22, 2009 [35].

On July 21, 2009, Dr. Killebrew notified SACS that the institution was in the process of adopting a new mission statement, which it considered to be a nonsubstantive change [36].

**Late Notification of Past Changes**

In fall 2008, the institution began informing SACS of various unreported changes that had occurred since the last reaffirmation of accreditation. All new degree programs mentioned below were approved by the appropriate campus review bodies and administrators, by the Board of Regents of The Texas A&M University System (unless delegated to the vice chancellor for academic and student affairs for approval), and by the Texas Higher Education Coordinating Board. Copies of the notification letters and the responses to them are included in the supporting documentation.

On November 25, 2008, Provost Babbili provided late notification of the addition of the bachelor of arts in theatre in 2002. The letter included the institution's reasons for considering this change to be nonsubstantive [37]. In her letter of February 12, 2009, Dr. Wheelan accepted the late notification and said that no additional information was needed [38].

In separate letters dated December 18, 2008, Dr. Killebrew notified Dr. Wheelan about the following changes:

- The addition in 2003 of (1) a program in economics leading to a bachelor of business administration degree with a major in business administration and (2) a bachelor of arts degree with major in economics [39].
- The addition of the bachelor of science degree program in athletic training in 2004 [40].
- The addition in 2007 of the master of science degree program in geospatial surveying engineering and the delivery of this program by distance education [41].

In her response dated March 9, 2009, Dr. Wheelan said that these programs were not a significant departure from the institution's approved curriculum. She accepted the late notification for the addition of the new programs and for the electronic delivery of 50 percent or more of the credits of the geospatial surveying engineering program, which had since been approved by the board of regents [30].
On February 3, 2009, Dr. Killebrew notified Dr. Wheelan of several related changes: the creation of a pre-professional program and a pre-clinical laboratory science program leading to the bachelor of science degree with a major in biomedical sciences in 2004; the creation of a post-baccalaureate certificate in clinical laboratory science; and the subsequent phasing out of the existing bachelor of science degree with a major in clinical laboratory science in 2008 [42]. (The new biomedical sciences program was designed to replace both the existing degree in clinical laboratory science and the pre-professional track in the undergraduate biology program.) Students in the clinical laboratory science program were allowed to either complete the existing program or switch to the new program. Existing faculty members were reassigned to the new program. In her letter of June 10, 2009, Dr. Wheelan said that the two new programs were not significant departures from the institution's approved curriculum, and she accepted the late notification for them. She noted, however, that "termination of a program not involving a teach-out agreement requires notification." She stated, "We accept the late notification and request no further information. However, the University should be aware that future failure to comply with the policy on substantive change will be reported to the Commission on Colleges for action and could result in the [c]ommission placing the institution on sanction [43]."

On February 16, 2009, President Killebrew notified Dr. Wheelan of the following changes involving distance education programs offered by the College of Nursing and Health Sciences:

- Online delivery of the M.S.N. degree in nursing and R.N./B.S.N. programs beginning in 2004. These programs previously delivered courses to off-campus sites using a combination of delivery methods including two-way interactive video.
- Implementation of a fast-track, distance learning B.S.N. program in nursing in College Station in 2005 and the phasing out of the program in 2008 [44].

On April 14, 2009, Dr. Wheelan accepted notification of these developments and requested the date when the off-campus sites were closed [34]. Dr. Killebrew provided this information on May 22, 2009 [35].

In separate letters dated March 3, 2009, Dr. Killebrew notified Dr. Wheelan of the following changes:

- A title change for the B.S. in control systems engineering technology to B.S. in electrical engineering technology in 2005. When the Texas Higher Education Coordinating Board approved the name change, it immediately phased out the control systems program. In 2006, the institution requested the reinstatement of the control systems program for a gradual phase out ending in 2009, rather than immediate phase out, to accommodate a few students who wished to graduate under the original title of the program rather than the new title [45].
- An increase of the length of two tracks in the M.S. in counseling program from 48 to 60 semester credit hours due to changing CACREP accreditation requirements and national trends [46].

Dr. Wheelan accepted notification of these changes in a letter dated April 14, 2009 [34].

President Killebrew has also notified SACS about the following changes for which a response has not yet been received:

- The use of the Islander Art Gallery in the Hamlin Center as an off-campus site for teaching studio painting courses in the master of arts in studio art and master of fine arts in studio art degree programs. Students in the painting concentration within these programs can receive over 50 percent of their course work at this location [47].
- The institution's minor support role in a cooperative Ph.D. in Hispanic studies. The degree-
granting institution is Texas A&M University located in College Station [48].
- The institution's participation in the Texas Electronic Coalition for Physics, a consortium of five SACS accredited institutions within The Texas A&M University System [49].

Additional Changes that May Require Notification
Following further review, the institution will provide notification about the use of distance education delivery methods in the higher education cognate (or career specialization) within the Ed.D. in educational leadership program. It is believed that students in this cognate can receive between 25 percent and 49 percent of their course work online or through other distance education delivery methods. Also, if the institution decides to phase out one or more programs in the future, prior notification will be provided.

Process to Ensure Compliance with Substantive Change Policy
To facilitate the identification of substantive changes, the provost's office is developing a new routing slip to document the review and approval of proposed new or revised academic degree programs, distance education programs, and certificate programs [50]. The routing slip will list all steps of the campus review and approval process. Dates and signatures will be required to confirm that a degree program, a certificate program, or the substantive use of distance education has been reviewed by the appropriate offices and advisory bodies. Additionally, the routing slip will include a category titled "SACS Substantive Change Determination." The SACS liaison on campus will be responsible for certifying that a new program, or distance education program, or certificate program is or is not a substantive change as defined by the SACS substantive change policy. Following further refinement of the routing slip, the new procedure will be in place by the beginning of the fall 2009 semester.

Conclusion
Texas A&M University-Corpus Christi recognizes the importance of the SACS substantive change policy and understands that reporting substantive changes in a timely manner is essential to ensure compliance with the policy and with federal regulations. The institution is committed to complying with the substantive change policy. Since the 2000 reaffirmation of accreditation process, the institution has provided prior notification regarding many proposed changes, as discussed in the above narrative. Nevertheless, certain other changes were not reported in a timely manner. Beginning with the readiness audit in spring 2008, the institution has taken steps to correct this problem. The institution has provided late notification of unreported changes, as detailed in the narrative and has developed a better process for identifying changes that require notification. The institution has taken these actions to ensure full compliance with the substantive change policy.

Evidence
- OD 114 SACS Substantive change policy
- UD 810 notification of SACS sub changes since last reaffirmation
- CO 033 Benberg 011801 EdD Sch Counseling
- CO 034 Harper 081701 transmittal memo for report - EdD School Counseling
- CO 035 Rogers 101701 Accept School Counseling EdD Letter
- CO 036 Furgason 032803 Notify - intent to offer BSN online
- CO 037 Rogers 052703 Accept online BSN
- CO 038 Furgason 070104 Notify - EdD Curriculum and Instruction
- CO 039 Rogers 071904 Accept EdD C and I
- CO 040 Furgason 090104 Notify - PhD CMSS and name change Counselor Ed
<table>
<thead>
<tr>
<th>Date</th>
<th>Name</th>
<th>Action/Request</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/04/05</td>
<td>Rogers</td>
<td>Acknowledge date</td>
</tr>
<tr>
<td>06/21/05</td>
<td>Harper</td>
<td>Transmittal of prospectus PhD CMSS</td>
</tr>
<tr>
<td>01/30/06</td>
<td>Wheelan</td>
<td>Request info - contingent approval CMSS and Level VI</td>
</tr>
<tr>
<td>02/24/06</td>
<td>Kirby</td>
<td>Submit CMSS info</td>
</tr>
<tr>
<td>03/24/06</td>
<td>Wheelan</td>
<td>PhD CMSS - final</td>
</tr>
<tr>
<td>10/12/06</td>
<td>Wheeless</td>
<td>Notify - MS Kinesiology</td>
</tr>
<tr>
<td>11/15/06</td>
<td>Wheelan</td>
<td>Accept MS Kinesiology</td>
</tr>
<tr>
<td>03/14/08</td>
<td>Killebrew</td>
<td>Notify - Joint MS PhD Marine Biology</td>
</tr>
<tr>
<td>05/29/08</td>
<td>Babbili</td>
<td>Addendum Marine Biology</td>
</tr>
<tr>
<td>06/02/08</td>
<td>Killebrew</td>
<td>SACS approval marine biology</td>
</tr>
<tr>
<td>03/09/08</td>
<td>Killebrew</td>
<td>Notify - BAS</td>
</tr>
<tr>
<td>12/19/08</td>
<td>Killebrew</td>
<td>Notify - MA Communication</td>
</tr>
<tr>
<td>03/09/08</td>
<td>Wheelan</td>
<td>4 topics - Communication Econ AT GSEN</td>
</tr>
<tr>
<td>02/19/09</td>
<td>Killebrew</td>
<td>Notify - BSME</td>
</tr>
<tr>
<td>02/19/09</td>
<td>Killebrew</td>
<td>Notify - Cooperative PhD Nursing Science w TWU</td>
</tr>
<tr>
<td>02/10/09</td>
<td>Killebrew</td>
<td>Notify - Reclassify EdD C and I as PhD</td>
</tr>
<tr>
<td>04/14/09</td>
<td>Wheelan</td>
<td>6 changes</td>
</tr>
<tr>
<td>05/22/09</td>
<td>Killebrew</td>
<td>Provide dates and other info</td>
</tr>
<tr>
<td>07/21/09</td>
<td>Killebrew</td>
<td>Notify - mission statement w enclosures</td>
</tr>
<tr>
<td>11/25/08</td>
<td>Babbili</td>
<td>Notify - BA Theatre</td>
</tr>
<tr>
<td>02/12/09</td>
<td>Wheelan</td>
<td>Accept BA Theatre</td>
</tr>
<tr>
<td>12/18/08</td>
<td>Killebrew</td>
<td>Notify - BBA BA Economics</td>
</tr>
<tr>
<td>12/18/09</td>
<td>Killebrew</td>
<td>Notify - BS Athletic Training</td>
</tr>
<tr>
<td>12/18/09</td>
<td>Killebrew</td>
<td>Notify MS GSEN and distance ed delivery</td>
</tr>
<tr>
<td>02/03/09</td>
<td>Killebrew</td>
<td>Notify - Biomedical Sciences and phase out CLS</td>
</tr>
<tr>
<td>04/14/09</td>
<td>Killebrew</td>
<td>Notify - SACS BS Biomedical Sciences Notice</td>
</tr>
<tr>
<td>02/16/09</td>
<td>Killebrew</td>
<td>Notify - Changes Nursing distance edu</td>
</tr>
<tr>
<td>03/03/09</td>
<td>Killebrew</td>
<td>Notify - BS EET name change</td>
</tr>
<tr>
<td>03/03/09</td>
<td>Killebrew</td>
<td>Notify - MS Counseling program length</td>
</tr>
<tr>
<td>04/14/09</td>
<td>Killebrew</td>
<td>Notify - Islander Art Gallery off-campus site</td>
</tr>
<tr>
<td>07/01/09</td>
<td>Killebrew</td>
<td>Notify - PhD Hispanic Studies support role</td>
</tr>
<tr>
<td>07/08/09</td>
<td>Killebrew</td>
<td>Notify - Texas Electronic Physics Coalition</td>
</tr>
<tr>
<td>09/01/09</td>
<td>Killebrew</td>
<td>Notify - student - Off-campus Site</td>
</tr>
<tr>
<td>07/01/09</td>
<td>Killebrew</td>
<td>Notify - SACS BS Biomedical Sciences Notice</td>
</tr>
<tr>
<td>07/08/09</td>
<td>Killebrew</td>
<td>Notify - student - Distance Edu</td>
</tr>
</tbody>
</table>

**UD 811 Meeting Notes**
- 32708 SACS Subcommittee on Accred Liaison
- 42508 SACS Accred Liaison
- 51508 SACS Accred Liaison

**UD 815 Responsibility Matrix - Substantive Change**
- Request info on substantive changes in colleges

**UD 816 Sub Changes Questions**

**UD 817 Routing Slip**
- Academic degree programs - distance ed - certificate programs