Guiding Statement on Submitting a Substantive Change Report or an Application to Add a Specialty Area or Program During an Accreditation Cycle: A guide for making the decision

Overview

After an institution has degree programs accredited by CACREP, they often make changes to their existing degree offerings. These changes may be anything from moving some courses online to adding a whole new specialization. It isn’t always clear how to ensure that changes to a degree or a new specialization will fall under the existing accreditation by CACREP. This document was developed to try help institutions make decisions to ensure that their changes or additions are reviewed in an appropriate and timely manner under CACREP’s policies and procedures. General scenarios are presented below as a guideline, but there are always contextual details that make any specific situation unique. Please do not hesitate to contact the CACREP office prior to any changes for guidance about how these decisions might be applied to your specific situation.

There are two policies that affect any changes and/or additions to CACREP-accredited counseling programs. They are:

The CACREP Substantive Change Policy outlines the means by which counselor education programs report and seek approval on certain types of programmatic or institutional changes that affect the accreditation status of the program and/or specialty area(s). Examples are changes in curriculum, faculty, degree titles, as well as offering one or more of the program’s accredited specialties at an additional site. An addition to existing online coursework of more than 25% would be a substantive change. The specific types of Substantive Changes are spelled out in the Policies Governing the Program Changes Mid-cycle 8.d – Adding a Specialty Area or Program during an Accreditation Cycle. If you are not sure if your situation merits a Substantive Change Report, you can call the CACREP staff and discuss it.

CACREP’s Adding a Program during Accreditation Cycle Policy outlines the procedures by which programs submit a new specialty area for accreditation review, or a 100% change in delivery method. The procedures to add a new specialty area include an application and full review process, including the possibility of a site visit. Specialty areas added through this process result in a separate accreditation decision.
Using the lens of the two policies above, there are certain changes to existing accredited offerings that seem to be common and are outlined below. Remember, please contact the CACREP office with specifics about how your individual circumstances differ from these guidelines.

**Adding Expanded Location**

If the institution is contemplating an expansion of campus sites, it should assess how similar the new site is to the existing accredited program, and review CACREP’s Multiple Sites Policy.

1. **Re-opening a campus location.** Programs reopening a cohort location that has been previously approved by CACREP would need to submit a Substantive Change Report. Please refer to Policies Governing the Pre-Application and Application Review Stages 1.n - Programs with Time-Limited Cohorts.
2. **Adding a new campus location.**
   a. If the site is brand new, but the program specialty area to be offered at the new site is identical to the accredited degree on the main campus, then the program faculty would submit a Substantive Change Report. Note that determining whether the program specialty area is identical means assessing items such as, whether it is the same core faculty, the same syllabi, and equivalent campus resources. Please note that the report should be submitted for review before students are enrolled to ensure that the first graduates of the site are considered graduates of a CACREP-accredited program.
   b. If the site is brand new, but the program is not identical to a currently accredited degree program, it will most likely need to be reviewed as a new applicant program through the procedures outlined in the Adding a Program during Accreditation Cycle Policy. This would be the case when the degree title is different, the faculty is different, or the required courses are different.
   c. If the new site is already in existence, and has current students or graduates, then it would need to be reviewed as a new application program through the procedures outlined in the Adding a Program during Accreditation Cycle Policy.

**Adding a New Focus Within an Existing Specialty Area**

An example of this would be when an institution decides to offer a new specialty focus in pastoral counseling within an existing accredited Clinical Mental Health Counseling specialty. If the proposed specialty focus met all of the same requirements as the current CMHC specialty, but added two courses as electives, or used a few courses as alternatives to the existing required courses, then they would submit a Substantive Change Report with evidence that the few added or alternative courses met the same requirements. Only the single, originally accredited program would be accredited and listed in CACREP’s directory, and it would be up to the program faculty to highlight the new focus option within that program in the Program Description field.

However, if the proposed focus area has a different degree, uses new and different faculty, has curriculum differences that affected 25% or more of the degree’s credit hours, or has existing students or graduates, then the institution would submit the new program for review under the procedures
outlined in the Adding a Program during Accreditation Cycle Policy. This program would then be separately accredited from the originally accredited program and would be listed separately in CACREP’s directory. If there were program graduates prior to accreditation, the 18 month recognition of program graduates as graduates of a CACREP-accredited program would be applicable.

Some Caveats to Keep in Mind

- Substantive Changes are meant to be submitted to CACREP 90 days before changes are enacted, so they should represent planned changes. Sometimes, however, changes happen without warning. In these instances, CACREP should be notified as soon as possible.
- In order for program faculty to be able to submit an application for review under the procedures outlined in the Adding a Program during Accreditation Cycle Policy, the institution must have at least two years left in the accreditation cycle. If there are less than two years remaining, the program faculty should include the new specialty area in their next full application for re-accreditation.
- There is no fee to submit a Substantive Change Report. The standard application fee applies when applying under the procedures outlined in the Adding a Program during Accreditation Cycle Policy.
- Substantive Changes do not normally result in a site visit; however, a required site visit is possible if the reviewers have significant questions and/or concerns. A site visit may also occur when adding a program during an accreditation cycle, if the reviewers deem it necessary.
- The 18 month recognition of program graduates as graduates of a CACREP-accredited program is only applicable, when the new specialty area and/or delivery method is reviewed under the procedures outlined in the Adding a Program during Accreditation Cycle Policy. This retroactive accreditation is not applicable for Substantive Change Requests.