

June 2, 2006

Belle S. Wheelan, Ph.D.
President
Commission on Colleges
Southern Association of Colleges and Schools
1866 Southern Lane
Decatur, Georgia 30033

Dear Dr. Wheelan:

I became aware, during a recent conversation with Michael Johnson, that Nashville State Technical Community College has not been interpreting the COC Substantive Change policy correctly and has underreported substantive changes at the College. Being a SACS veteran and loyal COC fan, I'm embarrassed about this. The purpose of this letter is to begin addressing the problem. Our reaffirmation year is 2008, so this is certainly the time to address the problem.

This letter provides you with a complete list of all programs that Nashville State is currently offering or developing so that we can submit needed materials and additional information to bring the College into compliance. Since 1997 was Nashville State's last reaffirmation year, I am using 1997 as the benchmark year and assume that all programs existing in 1997 are properly reported. I am, however, including a list of our entire academic inventory, with date of approval and comments, in order to avoid any omissions.

Nashville State has been interpreting "expanding at the institution's current degree level (significant departure from current programs)" too liberally. We have assumed that a certificate or associate degree career program (I.E.) was **not** a significant departure from other career programs at that level. When I apply Dr. Johnson's suggested criteria (i.e., requirements for different faculty, different facilities, new curriculum, and/or distinct equipment) as the definition of "significant departure," I believe that three Nashville State programs in the list below qualify as substantive changes. I am unsure about Early Childhood Education and seek your guidance. I have noted these programs in bold below. All of the unreported substantive program changes fall into this "significant departure" category.

I. Programs approved prior to 1997 (last SACS visit) and continuing:

11.3901	Computer Network Technology	A.A.S.	approved 1995
12.0503	Culinary Arts	A.A.S.	approved 1996
15.0303	Electrical Engineering Tech.	A.A.S.	approved 1978
15.0303	Electronic Engineering Tech	A.A.S.	approved 1978
15.0402	Computer Technology	A.A.S.	approved 1978
21.0101	General Technology	A.A.S.	approved 1978
43.0107	Police Science	A.A.S.	approved 1995
46.0302	Industrial Electrical Maintenance	Certificate	approved 1978
47.0604	Automotive Technology	A.A.S.	approved 1989
50.0402	Visual Communications	A.A.S.	approved 1990
50.0605	Photography	Certificate	approved 1978
51.0803	Occupational Therapy Asst.	A.A.S.	approved 1984
51.0909	Surgical Technology	Certificate	approved 1988
51.0201	Business Management	A.A.S.	approved 1986
52.0302	Computer Accounting	A.A.S.	approved 1978
52.0401	Office Administration	A.A.S.	approved 1978
52.1201	Computer Information Systems	A.A.S.	approved 1978

II. Programs terminated since 1997:

32.0199	International Communications	Certificate	terminated 2003
13.1501	Para-educator	Certificate	terminated 2003
15.0405	Automation Robotics	A.A.S.	terminated 1997
15.0603	Industrial Engin. Technology	A.A.S.	terminated 1997
15.0805	Mechanical Engin. Technology	A.A.S.	terminated 1997
15.0101	Architectural Engin. Technology	A.A.S.	consolidate 2002
15.0201	Civil/Constrc. Engin. Technology	A.A.S.	consolidate 2002
15.0507	Environmental Engin. Technology	A.A.S.	terminated 2002
15.0603	Manufacturing Engin. Technology	A.A.S.	terminated 2002
23.1101	Technical Communication	Certificate	in process
24.0101	Arts and Sciences	Certificate	terminated 2003
32.0101	Workforce Preparedness	Certificate	terminated 2003
48.0501	Industrial Machine Tools	Certificate	in process
52.0203	Industrial Distribution	Certificate	terminated 2003

III. Programs added since 1997:

24.0101	University Parallel	A.A.	approved 2002
	This degree and mission expansion experienced a substantive change on-site visit and received approval in 2001. The change was reported by TBR Chancellor Charles Manning to SACS in May 2001.		

- 24.0101 University Parallel A.S. approved 2002
This degree and mission expansion experienced a substantive change on-site visit and received approval in 2001. The change reported by TBR Chancellor Charles Manning to SACS in May 2001.
- 24.0102 Professional Studies A.A.S. approved 2001
This degree is offered through the Regents Online Degree Program (RODP). It is a collaborative online program offered by all 19 Tennessee Board of Regents colleges and universities. This substantive change was reported by TBR Chancellor Charles Manning. RODP had a substantive change on-site visit, and was approved, in 2003.
- 01.0605 Horticulture Certificate approved 2002
This 32 SCH certificate provides technical knowledge and hands-on skills needed for employment in the local landscape and nursery industries. **It should have been reported as a significant departure substantive change.**
- 52.1299 Web Page Authoring Certificate approved 2001
This 30 SCH certificate consists entirely of courses already offered through Visual Communications, Accounting, English, Business, Math, and Office Administration. No new faculty were hired. We do not believe this qualifies as a substantive change.
- 52.1200 Web Development Certificate approved 2005
This 30 SCH certificate is offered by Computer Information Services. All of the courses in the certificate are also part of the A.A.S. degree in Computer Information Systems. We do not believe this qualifies as a substantive change.
- 12.0503 Culinary Arts Certificate approved 2003
This 21 SCH certificate is offered by the Culinary program. All of the courses in the certificate are also part of the A.A.S. degree. We do not believe this qualifies as a substantive change.
- 15.1101 Architectural, Civil, and Construction Engineering Technology A.A.S. approved 2002
This degree is the consolidation of two separate degrees which the College has offered since 1978. It is accredited by ABET. Consolidation resulted from low enrollment and low number of graduates. We do not believe this qualifies as a substantive change.

- 15.0405 Industrial Automation Certificate approved 2004
This 30 SCH certificate uses the same faculty members and equipment already available as part of our engineering technology degree programs. It articulates into the technical concentration of our General Technology degree. We do not believe this qualifies as a substantive change.
- 48.0101 Computer-Aided Drafting Certificate approved 2003
This 28 SCH certificate uses the same faculty members and equipment that are used to teach CAD in our engineering technology degree programs. The courses will also count toward the degree. We do not believe this qualifies as a substantive change.
- 51.0205 Sign Language Interpreting A.A.S. approved 2001
This program required hiring faculty with qualifications not already available on campus and the development of new courses. **This should have been reported as a significant departure substantive change.**
- 19.0706 Early Childhood Education A.A.S. approved 1999
This is an A.A.S. degree that trains individuals to work in childcare centers. It does not lead to teacher certification. It did require hiring faculty with expertise in Early Childhood, although many faculty members already on campus have degrees in other areas of Education. This degree did not require new or unique facilities. It did require the development of some new courses. **We are uncertain about whether or not this should have been reported as a significant departure substantive change.**
- Nashville State also participates in the Tennessee Early Childhood Training Alliance (TECTA), which offers the Child Development Associate (CDA) required for employment in Head Start programs. The 13 SCH CDA program is not a formal degree or certificate program for the College. Rather, it is a collection of courses. All CDA courses can count toward the Early Childhood Education degree or certificate (below).
- 19.0706 Early Childhood Education Certificate approved 2003
All courses and faculty in this 22 SCH program are available in the degree program. All CDA courses count toward this certificate. We do not believe the certificate itself qualifies as a substantive change, although the degree may.

- 26.0616 Biotechnology A.A.S. approved 2002
 This program is related to other programs already offered by Nashville State. Only five courses in the degree program were developed specifically for this program. The remaining required courses are primarily Biology and Chemistry courses that are already offered by the College. While a lab has been equipped to fit unique needs of the Biotechnology courses, Biology classes are also taught in this space. The program coordinator is a biologist who teaches Biology courses as well as the Biotechnology courses. Based on this, we do not believe that this program qualifies as a substantive change.
- 44.0201 Social Services A.A.S. approved 2002
 This program was established for personnel working with childcare centers. It includes mostly social science courses taught by faculty with qualifications already existing on campus. We are finding that many students in this program are really hoping to transfer to baccalaureate social work programs and we are considering termination of the A.A.S. degree if this trend continues. Because these courses serve primarily transfer students, we do not believe this qualifies as a substantive change.
- 50.0909 Music Technology Certificate approved 1999
 This 30 SCH certificate prepares students for employment in Nashville's large music industry. It did require hiring faculty with qualifications not already available on campus as well as the development of new courses and a dedicated space and equipment. **This should have been reported as a significant departure substantive change.**
- 51.0909 Surgical Assisting Certificate approved 2004
 This 17 SCH program is the next career step for a Surgical Technologist. The qualifications for faculty are the same as Surgical Technology faculty, as are the facilities and equipment. We do not believe that this qualifies as a substantive change.
- 52.0701 Entrepreneurship Certificate approved 2004
 All courses in this 24 SCH program count toward the Business Management degree. They are taught by existing faculty and require no new facilities. No new courses were developed. We do not believe this qualifies as a substantive change.

IV. Programs/Changes Being Planned for Implementation:

- 13.0101 Teaching A.S.T. in approval process
Nashville State already offers the A.A.S. in Early Childhood, so Education courses and faculty are in place. Unfortunately, the Early Childhood program may not have been reported properly. The A.S.T. is a transfer degree that will be offered by all Tennessee Board of Regents community colleges and will transfer into certification programs at all TBR universities. Since it is a transfer degree that will require the development of only three new courses and will utilize existing Education faculty, we do not believe this qualifies as a substantive change.
- 15.0303 Electrical/Electronic Engineering Technology A.A.S.
in approval process
Nashville State has proposed consolidation of existing separate A.A.S. degrees in Electrical Engineering Technology and Electronic Engineering Technology, both of which the College has offered since 1978. They are accredited by ABET. The consolidation proposal is a result of considerable content overlap, low enrollment, and low number of graduates. We do not believe this qualifies as a substantive change.
- 41.0301 Process Control Technology A.A.S. in approval process
This degree has been requested by industries located near our Humphreys County Center. Initially, the program will be offered only at that facility. The program will train technicians for a variety of industries, including chemical and food processors. It is closely related to existing programs that the College offers, although some unique software will be required. A new faculty member will be hired because of the distance to the Humphreys County Center from the main campus. Based on Nashville State's history of training technicians and the close affinity of this proposed program with existing engineering technology programs, we do not believe this is a significant departure from current associate degree programs.
- 48.0101 3-D CAD and Automation Certificate in approval process
This program will offer 3-D CAD training. It will be an extension of the existing Computer-Aided Drafting certificate. The courses will be taught by existing faculty on existing equipment in existing facilities. We do not believe this qualifies as a substantive change.
- 11.3901 Advanced Computer Networking Certificate in approval process
This program will include the advanced Cisco Academy courses that are already part of the Computer Network Technology degree. The courses will be taught by existing faculty on existing equipment

in existing facilities. We do not believe this qualifies as a substantive change.

V. Off-Campus Sites:

Nashville State has three off-campus centers. The Cookeville Center was visited and approved as a substantive change during the 1997 reaffirmation visit. The Cookeville Center enrolled 285 FTE enrollments in spring 2006.

In 2002 responsibility for a Center in Humphreys County was transferred from Columbia State Community College to Nashville State Technical Community College. The Humphreys County Center enrolled 150 FTE during spring 2006. Columbia State received substantive change approval when that Center opened and notified SACS that it would cease operating at that location effective July 1, 2002. I was employed on the Tennessee Board of Regents staff at that time and can find no records that the campus notified SACS that responsibility for the Center was being transferred from Columbia State to Nashville State. Nor do current employees remember sending such notice. **I assume, therefore, that this was an unreported substantive change under Procedure 1: Initiating an off-campus site at which students can earn at least 50% of the credits toward an educational program.**

In fall 2005, Nashville State received state approval and began offering courses at the Southeast Center, located 1162 Foster Avenue in Nashville TN 37217. The Southeast Center is a former high school building located near a hub for Nashville's growing international population. The Southeast Center offers English as a Second Language, Developmental Studies, and limited general education courses. Students cannot earn as much as 25% of any certificate or degree program at the Center. It does not have its own faculty or administrative staff and does not have hiring authority. A letter of notification for the Southeast Center was submitted to SACS in 2005.

VI. Distance Learning

The College's first online program was the A.A.S. in Professional Studies, which is offered through the Regents' Online Degree Program (RODP) and was reported to SACS in 2001. The RODP program on-site substantive change visit took place in February 2003. Nashville State also reported in 2001 its intent to offer the A.A.S. degree in Business Management online. This was acknowledged and approved by Dr. James Rogers in September 2001.

Since that time, additional web-based courses have been developed and at least 50% of the courses required for the Office Administration A.A.S., the Web Page Authoring Certificate, and the Entrepreneurship Certificate are now available online.

By fall 2007, 50% of the Culinary courses required in the Culinary Arts A.A.S. and Certificate will be available online. Those courses will be developed within the next year.

Since most of the general education core courses are offered online through either Nashville State or the RODP and the transfer degrees consist primarily of general education courses, it would be possible for a student to complete more than 50% of the A.A. or A.S. degree online. However, Nashville State has not developed or promoted these as online programs.

When this subject of substantive change reporting came up in conversation with Dr. Johnson, I was mortified to realize that Nashville State was not in compliance on substantive change reporting. I have probably now sent you more information than you could possibly want, but I have included everything that we offer or plan to offer to give myself some peace of mind about our compliance.

Upon a response from you, we will proceed to develop and the materials necessary to bring Nashville State into compliance.

Sincerely,

Ellen J. Weed
SACS Liaison

Copy:
Dr. Tom Benberg, SACS staff representative
Dr. George H. Van Allen, President