

Section I: BASIC COURSE INFORMATION

Outline Status: **Approved Outline**

1. **COLLEGE:** L.A. SOUTHWEST COLLEGE
2. **SUBJECT:** ENGLISH AS A SECOND LANGUAGE - Noncredit
3. **COURSE NUMBER:** 055CE
4. **COURSE TITLE:** READING AND VOCABULARY: ACADEMIC BRIDGE
5. **CATALOG COURSE DESCRIPTION:**

This noncredit advanced ESL course is designed for students preparing to transition to credit academic or CTE programs. Emphasis is placed on reading fluency and comprehension as well as vocabulary development.

6. **CLASS SCHEDULE COURSE DESCRIPTION:**

This noncredit advanced ESL course is designed for students preparing to transition to credit academic or CTE programs. Emphasis is placed on reading fluency and comprehension as well as vocabulary development.

7. **CLASS HOURS:**

	Standard Hrs	Total Hours per Term (standard hour x 18)
Lecture Hrs:	0	0
Lab Hrs:	0	0
Totals:	Lecture: 0	Lecture: 0
	Lab: 0	Lab: 0
	Total: 0	Total: 0
<i>Totals In Protocol:</i>	Lecture: 5	Lecture: 90
	Lab: 0	Lab: 0
	Total: 5	Total: 90

8. **OTHER LIMITATIONS ON ENROLLMENT:** (See Title 5, Section 58106 and Board Rule 8603 for policy on allowable limitations. Other appropriate statutory or regulatory requirements may also apply):

Section II: COURSE CONTENT AND OBJECTIVES

1. COURSE CONTENT AND OBJECTIVES:

COURSE CONTENT AND SCOPE - Lecture: Outline the topics included in the lecture portion of the course (<i>Outline reflects course description, all topics covered in class</i>).	Hours per topic	COURSE OBJECTIVES - Lecture: Upon successful completion of this course, the student will be able to..(<i>Use action verbs - see Bloom's Taxonomy for 'action verbs requiring cognitive outcomes.'</i>)
Vocabulary study - prefixes, suffixes, forms of words, determining meaning from context	25	Define and use newly acquired vocabulary and apply spelling and capitalization rules. Employ a learner's dictionary to look up new words.
Reading comprehension and fluency	25	Build reading skills individual silent reading, paired reading, and group reading to increase speed, improve pronunciation and develop phonemic awareness
Reading using advanced technology	25	Demonstrate reading ability and practice computing skills through the use of online resources in the computer lab
Summarizing and analyzing	15	Review and restate ideas from articles to express main ideas and evaluate content
Total:	90	
Total Hrs In Protocol: 90		

1. (cont'd) LAB:

COURSE CONTENT AND SCOPE - Lab: Outline the topics included in the laboratory portion of the course (<i>Outline reflects course description, all topics covered in class</i>).	Hours per topic	COURSE OBJECTIVES - Lab: Upon successful completion of this course, the student will be able to..(<i>Use action verbs - see Bloom's Taxonomy for 'action verbs requiring cognitive outcomes.'</i>)
Total:	0	
Total Hrs In Protocol: 0		

1. (cont'd) SLO:

The student will.. (outcome)	As measured by the following method.. (assessment strategy)	And, if applicable, scored by the following learning rubric. (provide attachment)	Results are examined to determine if the outcome is achieved.Â Include planned or actual assessment date. (results & evaluation)	Recommendations to improve teaching and learning. (modifications)

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Essential Academic Skills: Reading and Communication

2. RESOURCE MATERIALS:

Provide a representative list of resource materials.

[Reading Aventures 3, Lieske and Menking, 2016; Ventures Transitions, G. Bitterlin, 2017](#)

3. REPRESENTATIVE READINGS:

If applicable, please provide representative examples of reading assignments.

[Students read an article in class and answer related vocabulary questions](#)

4. WRITING ASSIGNMENTS:

If applicable, please provide representative examples that demonstrate writing skills.

[Review and restate articles to express main ideas.](#)

Essential Academic Skills: Critical Thinking and Other Course Components

5. REPRESENTATIVE ASSIGNMENTS THAT DEMONSTRATE CRITICAL THINKING:

If applicable, please provide representative examples of assignments that demonstrate how students will begin to develop critical thinking skills.

[Students read and evaluate content of articles](#)

6. SELF-REFLECTIVE LEARNING:

If applicable, describe how students will reflect on their development as active learners. Provide representative examples below.

[N/A](#)

7. COMPUTER COMPETENCY:

If applicable, explain how computer competency is included in the course.

[Students will be introduces to online resources to practice timed readings and access online dictionaries.](#)

8. INFORMATION COMPETENCY:

If applicable, explain how information competency is included in the course.

N/A

Evaluation and Instruction

9. REPRESENTATIVE OUTSIDE ASSIGNMENTS (optional homework):

Out of class assignments may include, but are not limited to the following:

Students read books, newspapers and magazines.

10. METHODS OF EVALUATION:

Methods of evaluation may include, but are not limited to the following (please note that evaluation should measure the outcomes detailed 'Course Objectives' at the beginning of Section II):

Students are evaluated on their ability to read individually and in small groups and summarize the reading.
Students are quizzed regularly on relevant vocabulary and spelling.

11. METHODS OF INSTRUCTION:

Methods of instruction may include, but are not limited to the following.

- Discussion
- Activity
- Field Experience
- Independent Study
- Purposeful Collaboration
- Other (Please Explain)

12. SUPPLIES:

List the supplies the student must provide.

None

13. DIVERSITY:

If applicable, explain how diversity (e.g., cultural, gender, etc.) is included in the course.

Assigned readings will include topics of culture and diversity.

13. SCANS COMPETENCIES:

(required for all courses with vocational TOP Codes; recommended for all courses)

SCANS (Secretary's Commission on Necessary Skills) are skills the Department of Labor identified, in consultation with business and industry leaders, which reflect the skills necessary for success in the workplace. Check the appropriate boxes to indicate the areas where students will develop the following skills (please note that all SCANS competencies do not apply to all courses):

RESOURCES

- Managing Time:** Selecting relevant goal-related activities, ranking them in order of importance, allocating time to activities, and understanding, preparing and following schedules.
- Managing Money:** Using or preparing budgets, including making cost and revenue forecasts; keeping detailed records to track budget performance, and making appropriate adjustments.
- Managing Material and Facility Resources:** Acquiring, storing, allocating, and distributing materials, supplies, parts, equipment, space or final products in order to make the best use of them.

INTERPERSONAL

- Participating as Member of a Team:** Working cooperatively with others and contributing to group's efforts with ideas, suggestions and effort.
- Teaching Others New Skills:** Helping others learn needed knowledge and skills.
- Exercising Leadership:** Communicating thoughts, feelings, and ideas to justify a position, encouraging, persuading, convincing or otherwise motivating an individual or group, including responsibly challenging existing procedures, policies or authority.
- Negotiating:** Working toward agreement that may involve exchanging specific resources or resolving divergent interests.
- Working with Cultural Diversity:** Working well with men and women and with people from a variety of ethnic, social, or educational backgrounds.

INFORMATION

- Acquiring and Evaluating Information:** Identifying a need for data, obtaining the data from existing sources or creating them, and evaluating their relevance and accuracy.
- Organizing and Maintaining Information:** Organizing, processing and maintaining written or computerized records and other forms of information in a systematic fashion.

- Interpreting and Communicating Information:** Selecting and analyzing information and communicating the results of others, using oral, written, graphic, pictorial, or multimedia methods.
- Using Computers to Process Information:** Employing computers to acquire, organize, analyze and communicate information.

SYSTEMS

- Understanding Systems:** Knowing how social, organizational and technological systems work and operating effectively with them.
- Monitoring and Correcting Performance:** Distinguishing trends, predicting impacts of actions on system operations, diagnosing deviations in the functioning of a system/organization, and taking necessary steps to correct performance.
- Improving or Designs Systems:** Making suggestions to modify existing systems in order to improve the quality of products or services and developing new or alternative systems.

TECHNOLOGY

- Selecting Technology:** Judging which sets of procedures, tools or machines, including computers and their programs, will produce the desired results.
- Applying Technology to Tasks:** Understanding overall intent and proper procedures for setting up and operating machines, including computers and their reprogramming systems.
- Maintaining and Troubleshooting Equipment:** Preventing, identifying, or solving problems with equipment, including computers and other technologies.

Section III: SUPPLEMENTAL COURSE INFORMATION

1. **DEPT/DIVISION NAME:** **Non-Credit**
2. **DEPT/DIVISION CODE:** **92**
3. **SUBJECT CODE:** **991**
4. **SUBJECT ABBREVIATION:** **ESL NC**
5. **BASIC SKILLS:**

Title 5, section 55000(i) defines 'Noncredit basic skills courses' as 'those in reading, writing, computation, and English as a Second Language, which are designated by the community college district as noncredit courses.': **Yes**

6. **COURSE CLASSIFICATION:** **Noncredit Course**

Note: A course's Classification, TOP Code and SAM code must be aligned – e.g., Courses with an 'Occupational' Course Classification must have an 'Occupational' TOP Code and a SAM Code of A, B, C, or D; courses that do not have an 'Occupational' Course Classification cannot have an Occupational TOP Code and must have an 'E' SAM Code. Courses coded as 'basic skills' in #11 should be coded 'Adult and Secondary Basic Skills.'

7. **NONCREDIT COURSE CLASSIFICATION:** **J (Workforce Enhanced)**

Courses that are part of a Noncredit Certificate of Completion should be coded J (Workforce Enhanced).
Courses that are part of a Noncredit Certificate of Competency should be coded K (Other Enhanced).
Courses that are not part of a Noncredit Certificate should be coded L (Non-Enhanced).

8. **NONCREDIT ELIGIBILITY CATEGORY:** **ESL**

9. **TOP CODE** - (6 digits XXXX.XX): **4930.85**

Course content should match discipline description in Taxonomy of Programs found at <http://ecd.laccd.edu/TaxonomyOfPrograms.pdfcurriculum.htm>

10. **SAM CODE** (Student Accountability Model): **E**

11. **COURSE SPECIFICALLY DESIGNED FOR STUDENTS W/ DISABILITIES:**

Title 5, section 56029 allows a course to be repeatable when continuing success of the students with disabilities is dependent on additional repetitions of a specific class. Is this course designated as an 'approved special class' for students with disabilities?: **No**

If yes, provide an explanation of how this course meets the requirements of Title 5, section 56029:

12. **MATERIALS FEE:** **0.0000**

The Los Angeles Community College District may require students to pay fees for instructional materials that are of continuing value to the student outside of the classroom setting, including, but not limited to, textbooks tools, equipment, clothing and those materials that are necessary for the student's vocational training and employment. If applicable, please indicate any such fees.

13. **SPECIAL CHARACTERISTICS CODE DESCRIPTOR:**

Check all boxes that apply.

- Learning Assistance
- Bilingual Education
- Convalescent Setting
- Correctional Facility
- Persons with Substantial Disabilities
- Citizenship for Immigrants

14. JUSTIFICATION:

Briefly describe the primary method used to determine the need for this course. For example, Labor Market Predictions from Employment Development Department, employer survey, community or student interest survey, state licensing, requirements or mandated certification.

[Expansion of ESL classes for Adult Education authorized under AB 86/104.](#)

15. THIS COURSE WILL BE AN APPROVED REQUIREMENT FOR AN APPROVED ASSOCIATE DEGREE OR CERTIFICATE PROGRAM: **No**

a. If yes, the course will be a portion of the 'approved program' listed on the State Chancellor's Inventory of Approved Programs (approved programs can be found on the State Chancellor's Office website at <https://misweb.cccco.edu/webproginv/prod/invmenu.htm>)

16. FUNDING AGENCY CODE: Not Applicable

17. STATE COURSE ID:

Section IV: APPROVAL STATUS

Section VI: APPROVAL STATUS

1. APPROVAL STATUS:

		Approval Date Of	Board Date	Requested Effective Semester	Approved Effective Semester
a.	<input type="checkbox"/> New Course	College:	Board: 9/4/14	Effective Semester:	Effective Semester:
b.	<input type="checkbox"/> Addition of Existing District Course	College:	Board:	Effective Semester:	Effective Semester:
c.	<input checked="" type="checkbox"/> Course Change*	College: 11/26/18		Effective Semester: Winter 2019	Effective Semester:
d.	<input checked="" type="checkbox"/> Outline Update	College: 11/26/18			Effective Semester:
e.	<input type="checkbox"/> New Course	College:		Effective Semester:	Effective Semester:
f.	<input type="checkbox"/> New Course	College:	Board:	Effective Semester:	Effective Semester:

* Changes to a course require the completion of a 'Course Change Request' form and approval by the college's Curriculum Committee. In some cases districtwide approval is also required; see, Administrative Regulation E-65, section 3(c) for details.

Section V: APPROVAL INFORMATION FOR NEW OR ADDED COURSES

(complete in consultation with Department Chair and the appropriate Academic Administrator)

1. ORIGINATOR: **Marian, Ruane**

2. DEPARTMENT: **92**

3. IF THIS IS A NEW COURSE, INDICATE HOW THE COLLEGE PLANS TO MEET THE EXPENSE OF THIS COURSE:

By additional funds. Describe:

By deleting courses from the college catalog and course database. List specific courses to be deleted:

By deleting sections of existing course. List courses and number of sections to be deleted:

FIRST YEAR: SECOND YEAR: THIRD YEAR:

By rotating sections of existing courses. List courses and number of sections to be rotated, as well as the semesters in which they will be offered:

4. IMPACT

IMPACT -- Will this course directly impact other course offerings and/or associate degree or certificate programs on campus? (If yes, briefly explain how)

5. METHOD OF SUPPORT

-- Indicate how the college plans to support the proposed course:

A. Additional staff -- List additional staff needed:

B. Classroom -- List classroom type needed:

C. Equipment -- List new equipment needed and indicate funding source for any new equipment:

D. Supplies- List supplies and indicate dollar value:

E. Library/Learning Resources- The course initiator shall consult with the College Librarian and review the college library,

book, periodical, and electronic resource collections relevant to this course. List additional titles and resources to be considered for purchase as funding permits:

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Section VI: APPROVALS

CERTIFICATION AND RECOMMENDATION

This course meets Title 5 55002(c) requirements for Noncredit Course:

The course treats subject matter and uses appropriate resource materials, teaching methods, and standards of attendance.

The course outline of record specifies the number of contact hours normally required for a student to complete the course, the catalog description, the objectives, contents in terms of a specific body of knowledge, instructional methodology, examples of assignments and/or activities, and methods of evaluation for determining whether the stated objectives have been met.

We certify that the information and answers above properly represent this course.

Originator	Date
Department/Cluster Chairperson	Date
Articulation Officer	Date
Librarian	Date
Dean (if applicable)	Date
Curriculum Committee Chairperson	Date
Academic Senate President	Date
Vice President, Academic Affairs	Date

College President

Date

Section VII: ADDENDA
(Uploaded Documents)

**Los Angeles Southwest College
Curriculum Committee**



**Distance Learning Course Approval Guidelines
(Existing Courses)**

Title 5, Section 55206 requires that each proposed or existing course, if delivered by distance education, shall be separately reviewed and approved according to a District's certified course approval process. The distance education course should be reviewed through the cyclical review process of Program Review.

This form assures that the educational objectives of the course can indeed be achieved via distance delivery and it makes clear how instructors will maintain regular and substantive contact and interaction between themselves and students as required by Title 5, section 55204, examples of which can include, but are not limited to, asynchronous office hours conducted via the course management system, scheduled office hours and review sessions, monitoring and responding to a forum for posted student questions, regular course announcements published via the course management system and disseminated to all students enrolled, regular and prompt feedback regarding student work, leading themed discussions regarding the course materials and objectives via the course management system, facilitating student-to-student contact and virtual student groups. These are requirements of all Distance Education courses. Los Angeles Southwest College does not offer correspondence courses. Only Distance Education courses offered as online or hybrid may be submitted for approval. When submitting this form, the department chair certifies that all information in the DE Addendum is complete and accurate by submitting the DE Addendum via ECD.

Curriculum Committee approval certifies the following requirement have been met. Follow-up on these items is maintained at the Department level by faculty teaching online/hybrid courses and through the faculty evaluation process.

Course Quality Standards (Title 5, section 55372)

The same standards of course quality, including course content and objectives, are applied to distance education courses offerings as are applied to traditional classroom courses.

Course Quality Determinations (Title 5, section 55374)

Determinations and judgments about the quality of the distance education course offering were made with the full involvement of the faculty as defined by Administrative Regulation E-65 and college curriculum approval procedures.

Instructor Contact (Title 5, sections 55204 and 55376)

Each section of the course which is delivered through distance education will include regular and substantive contact and interaction between instructor and students.

Resources:

If you need assistance with any aspect of revising a course for online delivery, please contact:

Distance Education Coordinator

If you need assistance or clarification with any aspect of accessibility or reasonable accommodations that the college can make, please contact:

Distance Education Coordinator

Definitions

An **online course** never requires a meeting on campus but does require instructor initiated regular and substantive interaction with the students, either synchronously or asynchronously. These courses are conducted entirely over the internet where course materials are posted on a course website.

A **hybrid course** combines online learning with scheduled face-to-face class sessions on campus with the instructor. The campus sessions meet at the scheduled days, times, and defined location as indicated in the schedule of classes.

A **correspondence course** provides instructional materials by mail or electronic transmission, including examinations and materials. Interaction between the instructor and the students is limited, is not regular and substantive, and is primarily initiated by the student. These courses are usually self-paced.

LOS ANGELES SOUTHWEST COLLEGE
DISTANCE EDUCATION COURSE OUTLINE ADDENDUM

Online Status: Hybrid or Fully Online

Addendum Status: New Proposal

Subject Name & Course Number: ESL NC 055CE

Date: 6/25/2020

Cross-listed Subject Name & Course Number (if applicable): _____

1. DE REGULAR EFFECTIVE CONTACT METHODS:

- Online Assessment Feedback and Discussion
- Online Chat Rooms
- Online Synchronous/Live Conferencing/Webinars
- Instructor Participation in Online Open Discussion Forums
- Student-to-Student Interaction via Online Discussion Forums
- Other (specify): Online Announcements; Canvas Inbox

2. DE INSTRUCTOR-STUDENT AND STUDENT-STUDENT INTERACTION:

Please provide representative examples of how this type of activity demonstrates instructor-student and/or student-student interaction.

Students will receive regular and prompt individualized feedback from instructors on all graded assignments in the LMS. Students may also comment on the assignments they submit to instructors and respond to instructors about the individualized feedback they receive.

- Online chat features such as Canvas Chat and Pronto provide instructors and students a convenient, informal way to interact with each other quickly about any pertinent questions, ideas, suggestions, or concerns that come up.
- Instructors will offer lectures, facilitate discussions, and provide interactive practice and support with course content during optional online synchronous/live conferencing/webinars each week.
- Instructors will lead and participate in weekly themed discussion forums by posing and answering questions related to course materials and objectives, providing constructive feedback, and redirecting discussions if necessary.
- Instructors will strongly encourage students to interact with each other via online discussion forums. Weekly discussion forum assignments will include the instruction to respond to at least two classmates' discussion posts.
- Instructors will regularly post online announcements regarding important information about the class. Online announcements will include the "reply" option to maximize effective ongoing instructor-student and student-student interaction.
- Instructors will communicate regularly with students via LMS email such as Canvas Inbox. Instructors will respond to all LMS email messages from students within 24 to 48 hours. For online assessment feedback and discussion, students will be given individualized feedback on all major assignments

3. DE STRATEGIES FOR METHODS OF INSTRUCTION:

Please indicate what online learning strategies will be used as methods of instruction in online offerings and how they will enable the student to achieve the course SLOs and Objectives.

NOTE: Any component of this course that will be conducted via a publisher application in the DE Submittal Form - LASC May 2020 - Approved by CC on 5/12/2020, Approved by Senate on 5/12/2020

LMS or a website outside of the LMS must meet the college's requirements for accessibility, authentication, and student privacy.

- Online Publisher Resources
- Online Announcements
- Online Audio/Video Presentations
- Online Bulletin Board/Weblog
- Online Conferencing/Webinars
- Online Public/Class-wide Chat Rooms
- Online Public/Class-wide Discussion Forums
- Interactive Online Applications
- Interactive Software Applications
- Webcasts/Podcasts
- Other (specify):

4. DE STRATEGIES FOR SLOs/OBJECTIVES:

Please indicate how the selected online methods of instruction will enable the student to achieve the course SLOs and Objectives.

Course Objectives

1. Define and use newly acquired vocabulary and apply spelling and capitalization rules.

-Students will read lecture materials in LMS pages, read the course textbook/workbook/OER, view lecture videos, and optionally participate in online synchronous/live conferencing/webinars to become familiar with a variety of strategies to define and use newly acquired vocabulary and apply spelling and capitalization rules. There will be online practice and assessments as well as small group discussion and review.

2. Build reading skills individual silent reading, paired reading, and group reading to increase speed, improve pronunciation and develop phonemic awareness

-Students will read lecture materials in LMS pages, read the course textbook/workbook/OER, view lecture videos, and optionally participate in online synchronous/live conferencing/webinars to become familiar with strategies to build reading skills individual silent reading, paired reading, and group reading to increase speed, improve pronunciation and develop phonemic awareness

3. Demonstrate reading ability and practice computing skills through the use of online resources in the computer lab

-Students will read lecture materials in LMS pages, read the course textbook/workbook/OER, view lecture videos, and optionally participate in online synchronous/live conferencing/webinars to become familiar with a variety of strategies to demonstrate reading ability and practice computing skills through the use of online resources.

4. Review and restate ideas from articles to express main ideas and evaluate content

-Students will read lecture materials in LMS pages, read the course textbook/workbook/OER, view lecture videos, and optionally participate in online synchronous/live conferencing/webinars to become familiar with a variety of strategies to review and restate ideas from articles to express main ideas and evaluate content

5. DE STRATEGIES FOR METHODS OF EVALUATION:

Please indicate what online learning strategies will be used as methods of evaluation in online offerings.

NOTE: Any component of this course that will be conducted via a publisher application in the LMS or a website outside of the LMS must meet the college's requirements for accessibility, authentication, and student privacy.

- Files/Information Submitted Electronically
- E-portfolios
- Online Student Audio/Video Presentations
- Online Assessments
- Online Discussion Postings
- Online Application Use
- Software Application Use
- Other (specify):

6. DE STRATEGIES FOR PARTICIPATORY ACTIVITIES:

If applicable, please describe how online learning strategies will be used to enable online students to complete any required participatory activities such as collaborative assignments, student performances, demonstrations, oral presentations, laboratory activities, event attendance, site visits, field trips, etc.

NOTE: If strategies are not employed in order to accommodate such assignments (if required), then in-person contact hours must be required and the course must be offered as Hybrid only, rather than fully online.

N/A

7. DE EMERGENCY CONDITIONS:

If an emergency* were to occur once the course is in progress that prohibits planned in-person activities, what additional DE strategies will be used to enable students to achieve the relevant course SLOs/objectives and what additional resources would be required.

***Emergency: Pandemic or natural disaster.**

N/A

8. DE UNIVERSAL DESIGN:

Please acknowledge (by checking each box) that each item it represents must be addressed in all online content provided by the instructor, the college, the learning management system, publishers of online textbooks/content resources, websites linked to textbook or course content, and applications or software used.

- Provide an uncluttered interface with consistent layout and navigation
- Avoid moving or flashing images and self-starting video or audio.

- Ensure access for people with diverse abilities.
- Accommodate a wide range of individual preferences and abilities.
- Communicate necessary information to the user regardless of ambient conditions or the user's sensory abilities.

9. DE ACCESSIBILITY:

Please acknowledge (by checking each box) that each item it represents must be addressed in all electronic/digital, audio/video, and online content provided by the instructor, the college, the learning management system, publishers of online textbooks/content resources or content, websites linked to textbook or course content, and applications or software used must conform to the following criteria.

- Alternative text or alternative descriptions will be provided for all images.
- Instructional videos will have accurate closed captioning.
- Transcripts will be provided for all audio recordings.
- Pages will use structured headings (such as Header 2 for section headings) accessible to a screen reader.
- Hyperlinks will be presented using meaningful link text rather than URLs.
- Content will provide adequate color contrast (such as black and white background), font size (such as 12-14 points), and font style (such as Arial or Tahoma) to ensure readability.
- All PDF files will be text-based, not scanned, and use true headings (such as those created with the Styles menu in MS Word for saving as PDF).

10. DE AFFILIATED PROGRAM STATUS CHANGE:

This course is affiliated with the following programs. If this proposal will change the DE status of any program from 0-50% to 51-100%, an ACCJC Substantive Change Approval may be required. Contact your Accreditation Liaison Officer for more information. ***Although the course may be tentatively approved by the Curriculum Committee, it cannot be offered online until the report is filed and accepted.***

Checking the agreement box below indicates you are aware of this requirement.

- I agree and am aware of the Substantive Change term