



Middle States Commission on Higher Education

3624 Market Street, Philadelphia, PA 19104-2680

Phone: 267-284-5000 Fax: 215-662-5501 www.msche.org

Substantive Change Processes

(Effective January 2011)

Notification to the Commission on Higher Education

Changes that are substantive must be reported to the Commission prior to the planned date of implementation, consistent with the timetable for submission detailed under “Commission Review and Determination of Status.” Requests for prior approval of Substantive Change should be reported to the Commission prior to the planned date of implementation and should be directed to the President of the Commission.

The Institutional Profile annual update is not an appropriate vehicle for notifying the Commission of a substantive institutional change.

Although the Commission requires prior approval of substantive changes within both candidate and accredited institutions, once a request for approval of substantive change has been submitted, **Candidate institutions** must submit to a review of their candidate status (status review visit) as detailed in the Commission’s handbook, *Becoming Accredited*, unless staff determines otherwise. Visits or other types of review as required by specific types of change outlined in this policy also may apply.

If the institution is uncertain whether the proposed change is substantive or routine, the institution should contact the designated staff liaison with preliminary information on the nature and purposes of the activities. This should be done as early in the planning process as possible. Based on this preliminary review, the staff liaison will advise the institution and send confirmation by letter if appropriate.

Content of Substantive Change Requests

Substantive change requests should provide the necessary information **and analysis** in as concise a presentation as possible. While the length will vary dependent on the complexity of the substantive change, most requests will not be more than 25 pages. Submission should be loosely bound and paginated. Any supplemental documentation that accompanies the request must be specifically referenced within the proposal itself, and the relevance of any such documentation must be made apparent. Submissions can be made via an electronic mail attachment addressed to the staff liaison for the institution or by sending five full copies to the Commission office.

If the institution knows the proposed change is a substantive one or if the proposed institutional change is determined to be substantive based on staff review, the following information should be provided with the substantive change request. Additional elements listed below should be included if relevant to the type of substantive change.

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The following information is required unless waived by staff in a specific situation:

1. A one-page executive summary of the substantive change proposal;
2. Statement of the nature and purposes of the activities, including relevance to the current institutional mission and evidence of need for the activities;
3. Tentative or final plans in other areas such as expansion, merger, and/or change of size, locations, enrollment, and number or qualifications of faculty;
4. Financial Impact of the proposed change;
5. Analysis of the impact of the proposed change(s) on the rest of the institution or system; and
6. Legal authorization to conduct the program(s) or activity, if required.

In addition, such other information and documentation will be submitted as necessary to evidence continuing compliance with all accreditation standards. These may include submission of a complete long-term strategic plan, including plans for implementation of expansion, merger, and/or change of size, locations, enrollment, number or qualifications of faculty, and other relevant areas.

The institution should include the following as relevant to its particular proposal:

- basic planning documents including:
 - the budget and other information showing adequate financing for the projected activities; and
 - provisions for needed resources (faculty, administrators, library, facilities, etc.).
- intended constituency;
- governance and administrative organization;
- plans for the assessment of student learning outcomes;
- records of institutional procedures followed in approving the activities;
- copies of contractual arrangements; or
- publications announcing and/or describing the planned activities, if available.
- When applicable, institutions must also comply with the policy on Institutions with Related Entities and submit the required documentation.
- If the proposed change is to establish a branch campus, the request for inclusion within the scope of accreditation should include a description of the educational program(s) to be offered at the branch; the projected revenues and expenditures and cash flow at the branch; and the operation, management, and physical resources at the branch campus.

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- If the proposed substantive change concerns a new degree, academic program, or new delivery method, additional details should be included about the constituency that will be served, provision of necessary resources, expected budget, plans for assessing student learning outcomes, and any other relevant information.
- If the proposed substantive change concerns distance education, the institution should specify its method(s) for verifying student identity and for ensuring student privacy.
- If the Commission or Commission staff determine that the proposed change indicates rapid growth, the institution's request for inclusion of the substantive change within the scope of accreditation should include:
 - enrollment and financial projections for a three-year period;
 - identification of educational programs offered and planned at each site and the mode(s) of instructional delivery;
 - quality management controls (for the purpose of administrative and academic oversight);
 - staffing plan for faculty, administration, and student services;
 - plans (with timetable) for implementing the changes and for evaluating the progress of implementation; and
 - outlined plans to guide the coordination with existing activities.
- If the proposed change concerns change in legal status, form of control, or ownership of the institution, all relevant documents should be disclosed, such as acquisition resolution and agreements, oral or written. When applicable, institutions must also comply with the policy on Institutions with Related Entities and submit the required documentation.
- If the proposed substantive change involves matters requiring the approval of another agency, proof of that approval should be provided. For example: state agency approval (as required) for new degrees or programs should be provided; legal authorization should be included for programs offered in other countries or jurisdictions; etc.
- If an institution has prepared materials for approval by another agency, the institution may use these materials or excerpts from these materials, annotating and supplementing them as needed to meet the above information requirements.

Requests for approval of substantive change that fail to include adequate analysis (rather than merely provide documentation) may be rejected.

Commission Review and Determination of Status

Staff has authority to designate any activity as a substantive change, or to waive its treatment as substantive change, provided that staff's actions comply with all applicable laws and regulations.

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The types of factors staff may consider, for example, are the effect on other programs of the institution, the experience of the institution in the area of substantive change, the nature of an additional location, and other relevant information.

Substantive changes are usually brought for review and recommendation to an appropriate committee of the Commission such as the Committee on Substantive Change or the Committee on Follow-Up/Candidate Institutions. In some cases, substantive changes may be reviewed and an action may be recommended by staff. In such cases, the action will be placed on a consent agenda for committee review. All recommendations are submitted to the Executive Committee, which will act on behalf of the Commission.

In order to assure timely review and response, institutions preparing substantive change requests should adhere to the following timetable:

Submit report by:	for Executive Committee action at its meeting in:
September 1	October
November 1	December
January 1	February
March 1	April
May 1	June
July 1	August

Commission Action

If the Commission has determined that there is insufficient information to substantiate the institution's compliance with one or more accreditation standards should the substantive change request be granted, the Commission may postpone a decision and request a supplemental information report.

If, upon initial review by staff, it is clear that the substantive change request does not have sufficient information or detail for the Commission to consider the request, staff also may request that the institution re-submit the substantive change request with additional information as specified by staff.

If the Commission is not satisfied that the substantive change should be included within the scope of an institution's accreditation, the Commission may deny the institution's request to include the change within its accreditation. The institution may re-submit the substantive change request after the Commission's concerns are addressed.

The timing of final Commission approval or denial of a substantive change application depends on the specific situation.

The Commission reserves the right to decline to entertain a substantive change request by any institution that is not in compliance with eligibility requirements and accreditation standards,

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policies, guidelines, and practices including those institutions subject to Warning, Probation, or Show Cause.

The range of possible Commission actions include termination of Accreditation or Candidacy, refusal to consider or grant the substantive change, further review including on-site evaluation or complete self-study evaluation, and those other actions included in the policy statement, "Range of Commission Actions on Accreditation."

The Commission may amend its public disclosure statement to inform the public of a possible substantive change.

Site Visits/On-Site Review

In order to meet its obligations as an accrediting agency, the Commission may direct a site visit or require other action of an institution planning or undergoing change, as provided above, prior and/or subsequent to official action on the proposed change. The Commission and its staff will determine the individual(s) best suited to carry out the site visit.

The Commission reserves the right to conduct special monitoring activities prior and/or subsequent to the submission of and prior to approval of a substantive change proposal should there be institutional issues (e.g., reduction of programs, closure of instructional sites, financial exigencies, etc.) or other circumstances (e.g., adverse actions by other quality assurance agencies, investigations by regulatory agencies, legal issues that could affect the operations of the institutions, etc.), which might also affect the institution's ability to implement the proposed substantive change, to operate, or to fulfill its educational purposes.

Follow-up Reporting

Through specific follow-up activities directed by the Commission, or as part of the Periodic Review report or self-study, the institution may be asked to provide updated information to the Commission at critical stages in the implementation of the substantive change.

After review of the follow-up information (whether presented separately or as part of a self-study or PRR) the Commission may take any action provided in "Range of Actions" and require further review including, where appropriate, on-site evaluation of the activities, complete self-study re-evaluation of the entire institution, revocation of approval of the substantive change, or such other measures as the Commission may determine.

Extra-Regional Activities

Institutions conducting educational activities or establishing locations in other regions will be evaluated under the procedures outlined in "Inter-regionally Operating Institutions." An instructional site located in a region other than that of its home campus, if it functions independent of operational control of the parent college or university, will be considered under the policy, "Separately Accreditable Institutions."