



Middle States Commission on Higher Education

3624 Market Street, Philadelphia, PA 19104-2680

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

Procedures

Substantive Change

Procedures

(Version 021716)

I. Reasons for Submission of Substantive Change Requests

As explained in the Commission’s *Substantive Change Policy*, everything done in the name of an institution is covered by its accreditation status. Because institutions are dynamic, they must be re-evaluated on a regular basis. Certain types of institutional changes -- defined as “substantive” by the United States Department of Education (USDE) -- **require approval by the Commission prior to their implementation.** The types of substantive change are listed and defined in the *Substantive Change Policy*.

II. Submitting Substantive Change Requests

In advance of implementing any change that is deemed to be substantive, accredited and candidate institutions must submit a specific request for substantive change to the Commission. Other types of notification (e.g., the annual Institutional Profile, a letter to Commission staff, description in the self-study or periodic review report) are neither appropriate nor acceptable. If an institution is uncertain about whether a proposed change is substantive, the institution should contact the designated staff liaison with preliminary information on the nature and purposes of the planned change. This should be done as early in the planning process as possible. Based on this preliminary review, the staff liaison will advise the institution about whether or not to submit a substantive change request.

Submissions must be made via an electronic mail attachment and sent to sc@msche.org.

To allow for review and the possibility that additional information may be required, institutions are advised to submit substantive change requests **at least 3 months before the proposed change is scheduled for implementation.**

For most substantive change requests (**with the exception of complex substantive changes; see Section V. of these guidelines**), the following timetable applies:

Submission deadline:	for anticipated Commission action by the end of:
January 1	February*
March 1	April
May 1	June
July 1	August
September 1	October
November 1	December*

**Please note that meetings occur late in the month and action letters may not be received by the institution until the following month*

III. Content of Substantive Change Requests

Substantive change requests are reviewed by peer evaluators and members of the Commission, who make a determination about the effect of the proposed change on the quality, integrity and effectiveness of the total institution in relation to the Commission’s requirements of affiliation

and standards for accreditation. Substantive change submissions need to be thorough and analytical and they must include appropriate documentation. All documents that accompany a substantive change request must be specifically referenced, and the relevance of such documentation must be made explicit.

Substantive Change Request Forms (templates), which are posted on the MSCHE website, have been developed to guide institutional submissions in many areas of substantive change. If an appropriate template is available, the institution should complete and submit one template per substantive change. In cases where an appropriate template is not yet available, institutions should provide the following information:

1. Statement of the nature, purposes and need for the proposed change, including relevance to the institution's mission, objectives, and strategic planning process;
2. Analysis of the financial impact of the proposed change (including 3-year projections for enrollment, expenses, appropriate resources, and revenue);
3. Analysis of the impact of the proposed change on institutional organization and governance, student learning outcomes, student services, faculty credentials and selection, facilities, and overall institutional effectiveness;
4. Analysis of the impact of the proposed change on the institution's capacity to continue to meet the Commission's requirements of affiliation and accreditation standards;
5. Documentation of all necessary approvals required to initiate the proposed change (e.g., authorization from institutional governance structures, corporate parent or system office, state licensure body, and/or other applicable entities). Commission approval is *provisional* and the institution may not implement the change until the Commission receives all necessary paperwork.

IV. Complex Substantive Change Requests

If the proposed change is sufficiently complex that it requires more in-depth review or requires the Commission to engage a consultant with particular expertise (e.g., accounting, legal, etc.) it is considered a complex substantive change. Examples include (but are not limited to) acquisition of another institution, change of control, ownership, merger, consolidation, change in the status of multiple locations, direct assessment, or multiple types of change that are submitted simultaneously. If an institution is uncertain about whether a proposed substantive change should be considered "complex" the institution should contact the designated staff liaison who will advise the institution about how to proceed.

Complex substantive change requests are reviewed by the Committee on Follow-Up prior to Commission action; therefore, **complex substantive change requests may be submitted only three times per year**. The institution should consult with the designated staff liaison who will determine an appropriate timetable for submission and review, in accordance with the Commission's meeting schedule and review procedures. For most complex substantive change requests the following timetable applies:

Submission deadline for anticipated Commission action by the end of:

August 1	November
November 1	March
March 1	June

V. Review Procedures

Staff, peer evaluators, and members of the Commission have the authority to determine whether or not a substantive change request is complete and to request additional information from the institution before proceeding with the review process. When institutions are asked to submit additional information, they are usually given the opportunity to withdraw their request and re-submit at a later date.

If an institution would like to advertise, market, or recruit students and/or faculty for a substantive change that is under review, the institution must include a written notification on all relevant materials that the proposed change is “pending approval by the Middle States Commission on Higher Education.”

Substantive change requests are first reviewed by staff and peer evaluators who develop a proposal for action that is subsequently considered by an appropriate Committee; final action is taken by the Commission. The institution is notified of the Commission’s action in accordance with the policy, *Notification of Accreditation Decisions*. The Commission’s action is also posted to the MSCHE website.

VI. Commission Action

The Commission reserves the right to decline to review a substantive change request submitted by any institution that is not in compliance with the Commission’s requirements of affiliation or accreditation standards (including institutions that are subject to warning, probation, show cause or withdrawal of accreditation). The Commission may also decline to review a substantive change that is submitted by an institution that does not adhere to the Commission’s policies, guidelines, or procedures.

As part of the substantive change review process, accredited institutions may require visits and, unless staff determines otherwise, candidate institutions must submit to a review of their candidate status (status review visit) as detailed in the Commission’s handbook, *Becoming Accredited*.

Commission actions are delineated in the policy *Accreditation Actions*.

VII. Monitoring Activities

The Commission reserves the right to conduct monitoring activities in conjunction with its review of substantive change requests when, in the Commission’s judgment, there are issues that may affect the institution’s ability to implement the proposed change and maintain its quality, integrity and effectiveness. Such issues include (but are not limited to) reduction in programs, closure of locations, financial exigencies, adverse actions by other quality assurance agencies, investigations by regulatory agencies, and legal issues. Monitoring activities may precede or follow substantive change review and can include follow-up reports, requesting that the institution address issues related to the substantive change in a subsequent self-study or periodic review, and/or on-site visits by Commission representatives, who are selected at the discretion of the Commission. The Commission may take any action provided in the policy *Accreditation Actions* upon review of these monitoring activities.

VIII. Substantive Change Fees

For information about substantive change fees, including complex substantive change fees, the institution should refer to the policy *Dues and Fees*, which is posted on the MSCHE website under “Policies.”

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Related Documents: *Becoming Accredited, Dues & Fees, Notification of Accreditation Actions; Accreditation Actions, Statement of Accreditation Status (SAS), Substantive Change Policy*

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