**REQUEST FORM**

**Substantive Change Request Form**

*Effective* *Date: July 1, 2023*

**Written Arrangements - Domestic 25-49%**

**Tier III**

The Commission requires approval for the initiation of a written arrangement when the third party provides more than 25 percent of a credit bearing or Title IV eligible educational program, for both domestic and international written arrangements. For purposes of substantive change, a written arrangement is defined as a formal agreement for the provision of more than 25 percent of an accredited institution’s credit bearing or Title IV eligible educational program by a third-party provider that is not certified to participate in the Title IV federal student financial aid funding programs. The Commission also requires approval for the substantial modification of an existing written arrangement. If a contract is renegotiated, the terms change substantially, or the percentage offered by the third-party provider increases significantly (for example from 25 percent to 45 percent), the institution should revisit the contract and discuss the implications for substantive change with the Commission staff.

The services provided by the third-party must include the delivery of instruction for a credit-bearing or Title IV eligible course or educational program but may also include some combination of services including but not limited to establishing the requirements for admission or completion of the course, delivery of mandatory tutoring, curriculum development, online delivery of courses, student services, or assessment of student learning.

A written arrangement is considered domestic if it is an arrangement with an entity that is located or based inside the United States and the program will be implemented in a location that is located inside the United States. Written arrangements with domestic entities must be reviewed by the Commission when the third party provides more than 25 percent but less than 50 percent of the credit bearing or Title IV eligible program. The Commission will not review domestic written arrangements when the third-party provides more than 50 percent.

**Review and Organize**

* Read the [Substantive](https://www.msche.org/policies-guidelines/?title-search=substantive+change&type=) [Change Policy](https://www.msche.org/policies-guidelines/?title-search=substantive+change&type=), [Substantive Change Procedures](https://www.msche.org/policies-guidelines/?title-search=substantive+change&type=), [and Substantive Change Guidelines](https://www.msche.org/policies-guidelines/?title-search=substantive+change&type=) before completing the request form. This request form aligns with the Substantive Change Procedures effective July 1, 2023.
* Organize analysis and evidence sufficient for review. Several questions on this form contain “examples of evidence.” All of the examples are not required.
* Supply evidence that directly relates to the proposed change and provides sufficient information for the peer review process.

**Complete**

* Answer all questions with succinct and detailed information. Where some questions do not apply, note “N/A” in the provided response sections.
* The substantive change **request form including attachments should not exceed 100 pages**. Do not include attachments that have not been referred to in the request.
* Use current **PDF software and combine documents (label attachments appropriately) into a single, bookmarked file**.

**Submit**

* Submit request form in MSCHE Institution Portal. Instructions at [www.msche.org/substantive-change/](http://www.msche.org/substantive-change/)

**Date Submitted: Click or tap to enter a date.**

**Institution: Click or tap here to enter text.**

**City, State:** **Click or tap here to enter text.**

Section A: Substantive Change Request

Answer each question.

1. **Select the appropriate choice:**

New domestic written arrangement

Substantial modification of an existing domestic written arrangement

1. **Program Description**.
   1. List the educational program, including credential level and name of program, that will be partially provided by the third-party provider.

Click or tap here to enter text.

* 1. Is the program an existing program?

Click or tap here to enter text.

* 1. Location of Program **(**address, street, city, state, zip**):**

Click or tap here to enter text.

1. Describe the location. *If the location is geographically separate from the main campus and 50% or more of a program will be delivered at the location, a separate substantive change request for the establishment of a new additional location is required.*

Click or tap here to enter text.

1. Describe the **rationale** for the substantive change.

Click or tap here to enter text.

1. **Timeline:** Provide a timeline of the proposed substantive change with critical milestones. Include the anticipated effective date. (*Label attachment* ***Timeline***)
2. **Third-party provider**:
   1. Name and address of the third-party provider:

Click or tap here to enter text.

* 1. Describe the educational courses, programs, and services that will be provided by the third-party provider as a part of the agreement. What services are being outsourced or placed with the unaccredited, separate entity?

Click or tap here to enter text.

* 1. Indicate which services will be delivered by the third-party provider:

|  |  |
| --- | --- |
| **Service** | **Percentage** |
| Academic Advising |  |
| Admissions |  |
| Advertising or Marketing |  |
| Selection/Appointment of Faculty |  |
| Assessment |  |
| Award of credit/certificate/degrees |  |
| Curriculum Development |  |
| Faculty Qualifications/ Evaluation of Faculty |  |
| Instruction |  |
| Online Program Management |  |
| Recruitment |  |
| Student financial aid administration |  |
| Student Support Services |  |
| Other |  |

* 1. **Calculation of percentage of program (**federal regulation 34 CFR *§* 668.5**).** When determining the percentage of the program that is provided by the third-party provider, the member institution divides the number of semesters, trimester, or quarter credit hours, clock hours, or the equivalent that are provided by the third-party by the total number of semesters, trimester, or quarter credit hours, clock hours, or the equivalent required for completion of the program. A course is provided by the third party if the organization has authority over the design, administration, or instruction in the course, including, but not limited to (1) Establishing the requirements for successful completion of the course; (2) Delivering instruction in the course; or (3) Assessing student learning.
     1. What overall percentage of the program will be delivered by the third-party provider? Domestic written arrangements must be between 25-49%.

Click or tap here to enter text.

* + 1. Provide a table breaking down the required courses and percentages offered by the third party.

Click or tap here to enter text.

1. **Review of the Terms and Conditions of the Contract:**

The member institution should describe the terms and conditions of the contract and provide a copy of the contract in its final form. Please note the contract must be in English and in the primary language of the member institution.

* 1. Describe the period of time for the agreement, including exit clauses, non-compete provisions, and the conditions under which any possible renewal, renegotiation, or termination of the contract could take place.

Click or tap here to enter text.

* 1. Describe the provisions or clauses that provide appropriate protection for enrolled students in the event that a contract is terminated or renegotiated.

Click or tap here to enter text.

* 1. Describe the procedures for grievances regarding any aspect of offerings appropriated to the third party.

Click or tap here to enter text.

* 1. Describe avenues for addressing perceived breaches of the contract.

Click or tap here to enter text.

* 1. Describe the provisions which explicitly define how the member institution will award credit.

Click or tap here to enter text.

* 1. Describe the provisions which stipulate how the institution will ensure adequate and appropriate institutional review and approval of these services designed, delivered, or assessed by the third-party provider.

Click or tap here to enter text.

* 1. Describe the provisions related to compensation of faculty.

Click or tap here to enter text.

* 1. Describe the provisions related to compensation for the services provided by each of the parties, including for marketing, advertising, and recruiting students.

Click or tap here to enter text.

1. Attach a copy of the signed **Contract** in its final form. (Label attachment **Contract**)

Section B: Compliance with the Commission’s Standards for Accreditation, Requirements of Affiliation, Policies and Procedures, and Applicable Federal Regulatory Requirements

The Commission will only include a substantive change within the institution’s scope of accreditation if the change does not adversely affect the institution's compliance with the Commission's standards for accreditation, requirements of affiliation, policies and procedures, and applicable federal regulatory requirements.

1. **Mission and Goals Alignment (Standard I):** 
   1. Provide the institution’s current mission statement.

Click or tap here to enter text.

* 1. Describe how the proposed substantive change aligns with the institution’s mission and institutional or strategic planning goals.

Click or tap here to enter text.

1. **Communication (Standard II):**
   1. Describe how the institution will ensure that the new mission and/or objectives have been publicized and made known to key institutional stakeholders.

Click or tap here to enter text.

1. **Control and Oversight of the Program (Standard III):**
   1. Describe the involvement of the member institution in the program. Describe the specific components that the institution will manage.

Click or tap here to enter text.

Describe how the member institution will maintain oversight for the following:

* + 1. advertising and recruitment
    2. admissions
    3. appointment of faculty
    4. evaluation of student work,
    5. award of credit/certificates/degrees
    6. outcomes assessment
    7. academic advising
    8. student support services

Click or tap here to enter text.

* 1. Describe how institutional representatives will maintain responsibility to review and approve the content and rigor of courses and programs.

Click or tap here to enter text.

* 1. Describe how the courses to be offered and value and level of their credit are determined by the member institution in accordance with established institutional procedures.

Click or tap here to enter text.

* 1. Attach the institution’s policy and/or procedures for awarding credit. (Label attachment CreditHourPolicy)
  2. Attach a sample/template of the degree/credential (Label attachment SampleCredential)
  3. Describe the administrative staff who will be providing oversight of the program, including roles, responsibilities, credentials, and experience.

Click or tap here to enter text.

* 1. Provide an organization chart with institution and/or unit levels relating to the oversight of the proposed change. (*Label attachment* ***Organizational Structure***)
  2. Describe how, if any, college, or university policies and/or procedures have been modified as part of the written arrangement?

Click or tap here to enter text.

1. **Faculty and/or Staffing Needs (Standard III):** 
   1. Describe anticipated faculty and staffing needs for the program. Include a description of current faculty and staff that will be utilized for the program, where additional staffing is needed, student-faculty and/or student-staff ratios compared to the institution as a whole and/or other programs. Provide a hiring timetable if applicable.

Click or tap here to enter text.

* 1. Describe how the institution will ensure faculty and staff are qualified and sufficient in number to successfully implement the program. How will the instructors be deemed qualified?

Click or tap here to enter text.

* 1. How will instructors be evaluated?

Click or tap here to enter text.

* 1. Provide a list or chart of faculty and staff (by Title only) associated with the program including a description of their professional credentials, if they are employed by and/or compensated by the member institution or the third-party provider, and the institution’s standards for faculty qualifications, if applicable. *(Label attachment* ***Faculty/Staffing Needs****)*
* *A faculty member may not be considered adjunct faculty of the member institution if they are compensated and/or employed by the third-party.*

1. **Support of the Student Learning Experience (Standard IV):** 
   1. Briefly describe how the institution will ensure that faculty and students will have access to services, programs, and resources that are comparable to other programs

Click or tap here to enter text.

* 1. Describe how student support services necessary to complete courses/programs will be provided

Click or tap here to enter text.

* 1. Describe how student access to learning resources in support of requisite courses/programs will be assured

Click or tap here to enter text.

1. **Educational Effectiveness Assessment Processes (Standard V):**
   1. Describe how the institution will ensure adequate and appropriate institutional review and approval of these services designed, delivered, or assessed by the third-party provider

Click or tap here to enter text.

* 1. Describe how outcomes assessment will be conducted and how the third-party providers will periodically review the courses and programs

Click or tap here to enter text.

* 1. Provide evidence of a student learning assessment plan for the program. *(Label attachment* ***Assessment*)**

Click or tap here to enter text.

* 1. Describe how the program will be evaluated. How will this evaluation be integrated in the institution’s institutional effectiveness and continuous improvement processes

(*Include in narrative: Description of unit or assessment processes;* r*elated aspects of the institution’s strategic plan).*

Click or tap here to enter text.

1. **Financial and Risk Analysis (Standard VI):** 
   1. Provide an analysis of the financial impact of the change on the institution, including the following as applicable:
      1. An explanation of assumptions, projections of costs and revenues, and planned revenues and costs
      2. A narrative of budgeting and planning processes and how they will incorporate institutional changes associated with the proposed substantive change
      3. Net revenue statement associated with proposed change

Click or tap here to enter text.

* 1. Include three-year financial projections associated with the proposed substantive change. (*Label attachment* ***Financial Projections***)

Click or tap here to enter text.

* 1. Provide an analysis of risk factors that might impact the successful implementation of the change, including the following as applicable: 
     1. Budgeting and planning processes and how they will incorporate institutional changes associated with the proposed substantive change
     2. References to and/or evidence of institutional and/or unit “SWOT” analyses

Click or tap here to enter text.

* 1. Provide a brief analysis of three-year enrollment projections as they relate to the program

Click or tap here to enter text.

* 1. Provide three-year enrollment projections *(Label attachment* ***Enrollment Planning***)

1. **Required Disclosures**. Federal regulation 34 *CFR 668.43(a)(12)(i-iv)* requires that the institution provides required disclosures to prospective and enrolled students where a program is designed to be offered by another entity. The disclosure must include the degree/certificate granting school, name and location of the other entity, method of delivery being offered by the degree/certificate granting school and estimated additional costs that may be incurred by students due to the arrangement.
   1. Attach a description of how the institution will meet the requirements for disclosures of written agreements

Click or tap here to enter text.

* 1. Describe how the member institution’s website will provide sufficient information to current and prospective students about the program and the nature of the affiliation with the third party

Click or tap here to enter text.

* 1. Provide documentation of this disclosure. (Label attachment **Disclosure Written Arrangements**)

1. **Title IV Certification**. If the institution participates in Title IV student financial aid programs with the United States Department of Education (USDE), please answer the following questions:
   1. Will the institution apply for certification to participate in Title IV programs or submit a change to the E-App related to this substantive change?

**Click or tap here to enter text.**

* 1. Attach the institution’s current Eligibility and Certification Approval Report (ECAR).

*The institution must also submit an updated E-CAR to the Commission documenting the USDE approval of the change as soon as it is available. Email the document to* [*substantivechange@msche.org*](mailto:substantivechange@msche.org)*.*

1. Please provide, very briefly, any additional information that may be helpful to the Commission regarding this substantive change.

**Click or tap here to enter text.**

**Section C: Institutional Standing with Quality Assurance Agencies**

Complete the following table.

|  |  |  |
| --- | --- | --- |
| Institutional Standing Question | Accrediting Agency Status | If **YES**, please indicate:   * Name of the agency * Due date of the next report * Attach a copy of the most recent related action letter |
| Is the institution currently in non-compliance status (e.g., warning, probation, show-cause) or subject to any adverse action with the Commission? | NO  YES |  |
| Has any other accrediting agency asked for follow-up reporting from the institution, including any of its branch campuses, additional locations or other sites within the last two full academic years, including the current year? | NO  YES |  |
| Is the institution being monitored or reviewed by any federal agency, including the United States Department of Education, or any state agency for any reason (including but not limited to Title IV program responsibilities, heightened cash monitoring), including any of its branch campuses, additional locations or other sites within the last two full academic years, including the current year? | NO  YES |  |

**Section D: Required Approvals for the Substantive Change**

List and **provide written documentation** of all required internal and external approvals required for the proposed substantive change.  The institution must provide written documentation from the entity or agency to demonstrate if no approval is required (e.g., correspondence, regulation, statute). The institution must provide written documentation of all required approvals to the Commission as soon as they are received.  (***Label attachments Board-Approval, State-Agency-Approval, Federal Agency-Approval, etc****.)*

|  |  |  |  |
| --- | --- | --- | --- |
| Type of Approvals | Name of Agency | Obtained? | Date Received  Date Expected  *If not required, provide documentation* |
| Institutional  (signed contract, *administration, faculty, committees, governing body*) |  | \*NO  YES |  |
| System |  | NO  YES  N/A |  |
| State |  | NO  YES |  |
| Federal  *(including USDE and any Title IV implications)* |  | NO  YES |  |
| International |  | NO  YES  N/A |  |
| Other Legal, Contractual, or Other Required |  | NO  YES  N/A |  |

*\* The institution must provide, at a minimum, written documentation of all required institutional approvals with the submission of this form.*

**Section E: Checklist and Certifications**

By signing and submitting this *Substantive Change Request Form*, the individual below certifies that:

* The *Substantive Change Policy* *and* *Procedures* and other relevant policy or procedures have been reviewed.
* The information included in the substantive change request form is accurate at the time of submission.
* The institution will notify the Commission of subsequent, significant developments that could affect the Commission’s decision.
* The substantive change request form has been completed in its entirety and attachments are appropriately labeled to facilitate the review.
* The appropriate individuals at the institution have authorized the submission of this request for review by the Commission.
* The institution understands it must take into consideration applicable State laws, the Family Educational Rights and Privacy Act (FERPA) and other privacy laws. The institution may redact personal or sensitive information, in accordance with these laws, for submission to the Commission.
* The institution understands that prior approval of all substantive changes before implementation is required by the Commission
* The institution understands that retroactive approval will not be included within the institution’s scope of accreditation.
* The institution understands it should not advertise or market the substantive change before the request is submitted.
* The substantive change request does not adversely affect the institution’s compliance with the Commission’s standards for accreditation, requirements of affiliation, and policies and procedures, and applicable federal regulatory requirements.
* The institution understands that the Commission reserves the right to reject incomplete requests.
* The institution understands that it must provide immediate notification of any outstanding information (for example, a site visit, evidence of appropriate approvals, etc.), and it is the responsibility of the institution to ensure all conditions have been met and that the Commission has received all necessary documentation.
* The institution understands that the Commission may take action in accordance with its *Accreditation Actions Policy and Procedures.*

**The Substantive Change Request Form must be submitted by the institution’s Accreditation Liaison Officer (ALO)**

Provide Name, Title, Email, and Phone Number of (ALO) submitting this request:

|  |
| --- |
| Name: **Click or tap here to enter text.**  Title: **Click or tap here to enter text.**  Email: **Click or tap here to enter text.** Phone Number: **Click or tap here to enter text.** |

*Please sign by typing the name of the Accreditation Liaison Officer (ALO) or including an electronic signature of the ALO in the space provided:*

Signature of ALO: **Click or tap here to enter text.**

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