**Substantive Change Prior Approval Request Form**

*Effective* *Date: July 1, 2023*

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**Written Arrangements for the Provision of 1-24 Percent of an Educational Program**

**Tier I**

This change is defined as the initiation of a domestic written arrangement under which an institution or organization that is not certified to participate in Title IV programs will provide 1-24 percent of the institution’s educational programs.

For purposes of substantive change, a written arrangement is defined as a formal agreement for the provision of more than 25 percent of an 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 services provided by the third-party may be for the provision of an educational program, such as the instruction or delivery of courses, but may also include a combination of student services, curriculum development, online delivery of courses, student services, setting and validating admission requirements, or assessment.

**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.”
* 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.
* 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.
* All attachments should be labeled appropriately. The form and the attachments should be combined into one **single bookmarked PDF** document.

**Submit**

* Submit request form in MSCHE Institution Portal. Instructions at [www.msche.org/substantive-change/](http://www.msche.org/substantive-change/) . For technical assistance for submitting request forms to the MSCHE portal, please contact [support@msche.org](mailto:support@msche.org).

**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

Answer each question.

1. Has the institution had any non-compliance action when the Commission issued or continued (warning, probation, or show cause) in the past three years or is under a provisional certification for participation in Title IV, HEA programs?

Yes **\*No**

**\*If No, DO NOT COMPLETE THIS FORM. Submit a notification to the Commission directly through the Portal at** [**https://msche.force.com/ip**](https://msche.force.com/ip)**. Prior approval is not required.**

**If yes, the Commission has taken any non-compliance actions (including the continuation of a non-compliance action) in the past three years, please provide a brief summary.**

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

**If yes, the institution is under a provisional certification for participation in Title IV, HEA programs, please attach the documentation.**

1. Provide a **brief overview and rationale** of the change.

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

1. **Third-party Provider**

* 1. Full Name and address of the third-party provider:

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

* 1. Describe the 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. What percentage of the program will be delivered by the third-party provider?

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

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. **Description of Program:**

|  |
| --- |
| * 1. List the educational program, include credential level and name of program, that will be delivered by the third-party provider.   **Click or tap here to enter text.**   * 1. Is the program an existing program? If so, provide a rationale to move this portion of the program to a third-party vendor.   **Click or tap here to enter text.**   * 1. Location of Program **(**address, street, city, state, zip/ country**):**   **Click or tap here to enter text.**   * 1. Is this a new location for the institution?   NO  YES\*  \* Does the new location also require substantive change review? See Substantive Change Guidelines.    **Click or tap here to enter text.** |

1. **Contract:**

* 1. The period of time for the agreement, including exit clauses, 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 plants to 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 policies and procedures for grievances regarding any aspect of offerings appropriated.

**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 provisions which explicitly define:
     1. the institution’s awarding of credit;
     2. educational courses, programs, and services included in the contract;
     3. how the institution will ensure adequate and appropriate institutional review and approval of these services designed, delivered, or assessed by the third-party provider;
     4. how program/course learning outcomes assessment will be conducted and how the contracting entities will periodically review the courses and programs;
     5. how student support services necessary to complete courses/programs will be assured;
     6. how student access to learning resources in support of requisite courses/programs will be assured;
     7. compensation and other considerations 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**)
2. **Timeline:** Provide a timeline of the proposed substantive change with critical milestones. Include the anticipated effective date.

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

1. **Related Entities (Standard VII)**.

If this substantive change involves a related entity as defined in the Commission’s *Related Entities Policy and Procedures*, please answer the following questions:

1. Describe the institution’s relationship with the related entit(ies) and the entity’s role in the substantive change, particularly in the delivery of any educational program.

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

1. The Commission staff may request that the institution provide the *Related Entities Required Disclosures and Certification Statement* for certain types of substantive changes. Provide the certification statement only upon request.
2. **Oversight of the Program:**
   1. Describe the involvement of the institution in the program. Describe the specific components that the institution will manage and provide oversight of the program.

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

* 1. Describe the administrative staff with appropriate credentials and experience, who will be providing services or oversight of the proposed change including roles and responsibilities.

**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 VI):** 
   1. Describe how the institution will ensure instructors and staff are qualified and sufficient in number to successfully implement the change. 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 associated with the change including a description of their professional credentials, programmatic accreditor’s standard around faculty qualification, if applicable. *(Label attachment* ***Faculty/Staffing****)*

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

**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. Provide evidence of a student learning assessment plan for the program. *(Label attachment* ***Assessment*)**
  2. Describe how the change will be evaluated. How will this evaluation be integrated in the institution’s institutional effectiveness and continuous improvement processes?

(*Include in a 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 Analysis (Standard VI):**
2. Provide an analysis of the financial impact of the proposed substantive change on the institution.

(*Include in a narrative*: *Brief analysis of financial projections of new program with an explanation of assumptions, projections of cost and revenues, and planned revenues and costs, description of budgeting and planning processes and how they will incorporate institutional changes associated with the proposed substantive change; profit and loss statement associated with proposed change.*

*Examples of evidence: Three-year financial projections, profit, and loss statement of new program*).

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

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

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 B: Institutional Standing with Accrediting 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 current year? | NO  YES |  |

**Section C: 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  (*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 D: Checklist and Certifications**

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

* The *Substantive Change Policy* *and* *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 scope of the institution's accreditation status.
* The institution understands it should not advertise or market the substantive change before the request is submitted.
* The institution understands that the Commission will not include a substantive change if it adversely affects the institution's compliance with the Commission's standards for accreditation, requirements of affiliation, policies and procedures, and applicable federal regulatory requirements.
* The institution understands that the Commission reserves the right to reject incomplete requests or requests that exceed 100 pages.
* The institution understands that it must provide immediate notification of any outstanding information (e.g., a site visit, evidence of appropriate approvals, etc.). The institution's responsibility is 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.**

Version: 2023-07-01 EFFECTIVE