**Complex Substantive Change Review Report**

*Effective Date: July 1. 2023*

**INSTRUCTIONS:**

* *Peer evaluators must review the* ***Substantive Change Policy*** *and* [***Complex Substantive Change Procedures***](http://www.msche.org/Documents/SubChangeProcedures.pdf) *before completing this form.*
* *Peer evaluators must review the Complex Substantive Change Preliminary Review Form,* ***Complex Substantive Change Request Form*** *and all attachments submitted by the institution (plus any additional information available in the secure MSCHE portal).*
* *If a teach-out plan or agreements were required for the complex substantive change, those materials may be reviewed in the secure MSCHE portal in the separate teach-out review.*
* *Peer evaluators may request additional information according to the Procedures.*
* *Send questions, concerns, or requests for additional information from the institution to Substantive Change staff at* [**substantivechange@msche.org**](mailto:substantivechange@msche.org)**.**
* *The first substantive change reader is responsible for uploading the completed review report to the secure MSCHE portal – Chrome browser recommended. The review report must be submitted in PDF format.*
* *The first substantive change reader is responsible for uploading the completed separate Confidential Brief to the secure MSCHE portal. The Confidential Brief must be submitted in PDF format.*

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

**Date of this Report:** **Click or tap to enter a date.**

**Date of Preliminary Review Form Submission:** Click or tap to enter a date.

**Date of Complex Substantive Change Request Submission:** Click or tap to enter a date.

**Anticipated Date of Transaction: Click or tap to enter a date.**

**Sub-Type of Change in Legal Status, Form of Control, or Ownership**: **Click or tap here to enter text.**

\**The MSCHE staff verified the type of change in the summary provided to peer evaluators.*

# **Evaluator Information**

**First Substantive Change Reader:** Click or tap here to enter text.

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

**Second Substantive Change Reader:** Click or tap here to enter text.

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

*By typing my name above, I affirm that I have reviewed all forms and attachments submitted by the institution. I understand that confidentiality must be maintained relating to this submission and the proposal for action until the Commission action is communicated to the institution.*

# **Requests for Additional Information**

If you requested additional information, please list or describe the additional information you reviewed. All additional information that was requested and reviewed must be uploaded into the secure MSCHE portal by the institution.

Click or tap here to enter text.

# **Conference Call Information: OPTIONAL**

If the evaluators engaged in a conference call with the institution’s representatives, please provide the following information:

Date of the conference call: Click here to enter a date.

Individuals participating in the conference call:

Click or tap here to enter text.

Brief summary of call:

Click or tap here to enter text.

# Section A: Description of Complex Substantive Change

1. **Description:** Provide a brief overview (less than 500 words) of the complex substantive change that will help to describe the change to the Committee. Include the sub-type of change in legal status, form of control, or ownership.

Click or tap here to enter text.

1. **Needs Analysis**:Describe how the institution documented and explained the need for the change.

Click or tap here to enter text.

1. **Timeline**: Provide an analysis of the institution’s timeline for the complex substantive change request, noting impacts upon the institution. Has the institution met critical milestones established in the timeline? Are there sufficient resources and planning to implement the complex substantive change fully?

Click or tap here to enter text.

1. **Status of Legal Documents**: Verify that the appropriate legal documents have been submitted and reviewed. The MSCHE staff provided a summary for peer evaluators. The Commission should not approve complex substantive changes without the submission of all required documents. Peer evaluators must request the submission of any outstanding documents as additional documents or in a supplemental information report.

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| **LIST OF SUBMITTED LEGAL DOCUMENTS:** | | |
| Name of Document | Submitted Yes/No | Date |
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1. **Revised Scope of Accreditation.**

A change in ownership or control can involve any number of changes or transactions which are defined in federal regulation and described in the *Substantive Change Guidelines*. If any of the additional substantive change types are checked in the complex substantive change request form (Section A.1.b), the institution must provide information about those changes and the changes must be reviewed by peer evaluators in order to be included within the surviving institution’s scope of accreditation. Document the surviving institution’s revised scope of accreditation here (any significant departure from existing educational offerings, new, relocation, reclassification or closures of locations, alternative delivery methods, changes to credential).

Click or tap here to enter text.

1. **Description of Accreditation**: Identify any concerns related to the transaction and its impact on the institution’s accreditation.

Click or tap here to enter text.

* *It may be helpful to review the teach-out plan submitted by a member institution, if any, for information about the date that accreditation will cease for an institution that will cease to exist.*
* *The Commission staff will provide any critical information related to the status of accreditation to peer evaluators.*

1. **Teach-Out Plans and Agreements**

Complex substantive changes may require a teach-out plan and agreements if one or more member institutions will cease to exist as a result of the transaction in accordance with the Commission’s Teach-Out Plans and Agreements Policy and Procedures. The purpose of a teach-out plan is to provide for and make accommodations for students to complete their educational programs or transfer to a new institution with ease. As applicable, the institution uploads the teach-out plan and teach-out agreements into a separate review in the portal. Peer evaluators should review the teach-out plan and agreements. complete the Teach-Out Plans and Agreements Review Report, and upload it into the separate teach-out review.

# **Section B: Compliance with Commission Standards for Accreditation, Requirements of Affiliation, Policies and Procedures, and Applicable Federal Regulatory Requirements**

Analyze the institution’s capacity to maintain compliance with the Commission’s standards for accreditation, requirements of affiliation, policies and procedures and applicable federal regulatory requirements. If the question does not apply, enter NA.

1. **Mission and Goals**
   1. Provide an analysis of how the accredited institution will maintain compliance with Standard I: Mission and Goals, noting the following where appropriate:
      1. Reasonable alignment of any partner institutions in terms of mission, program or educational offerings, student focus, culture, fit or values.

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

* + 1. Changes to the institution’s mission or goals were developed through appropriate collaboration, have been publicized and made known to key institutional stakeholders.

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

* + 1. Mission and goals are supported by administrative, educational, and student support programs.

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

* 1. Identify any challenges or concerns related to the changed institution’s compliance with mission and goals:

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

1. **Ethics and Integrity**
   1. Provide an analysis of how the accredited institution will maintain compliance with Standard II: Ethics and Integrity, noting the following where appropriate:
      1. Sufficient plans to communicate the change with key stakeholders transparently and honestly

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

* + 1. Evidence that the institution’s policies and procedures will be consistently applied after the change

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

* + 1. The institution’s ability to operate effectively, to ensure that student achievement is a central concern, or any other issues having to do with the institution’s achieving standards of ethics and integrity

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

1. Identify any challenges or concerns related to the accredited institution’s continuing compliance with ethics and integrity as a result of the change:

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

1. **Design and Delivery of the Student Learning Experience** 
   1. Provide an analysis of how the accredited institution will maintain compliance with Standard III: Design and Delivery of the Student Learning Experience, noting the following where appropriate:
      1. Manage major changes to educational programs or curricula.

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

* + 1. Ensure rigor of courses, programs, and curricula.

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

* + 1. Support faculty, staff, and administration.

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

* + 1. Appropriately allocate instructional and academic resources to ensure student success.

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

* 1. Identify any challenges or concerns related to the accredited institution’s compliance with the design and delivery of the student learning experience:

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

1. **Support of the Student Experience:** 
   1. Provide an analysis of how the accredited institution will maintain compliance with Standard IV: Support of the Student Experience, noting the following where appropriate:
      1. Impact of the change on services to students.

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

* + 1. Major changes to the student population.

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

* + 1. Apply ethical recruitment and admissions practices.

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

* + 1. Evaluation and transfer of credit.

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

* + 1. Consistency in and support of the student experience across all educational experiences, settings, levels, instructional modalities, and locations.

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

* 1. Identify any challenges or concerns related to the accredited institution’s compliance with requirements related to the support of the student experience:

Click or tap here to enter text.

1. **Educational effectiveness assessment**
   1. Provide an analysis of how the accredited institution will maintain compliance with Standard V: Educational Effectiveness Assessment, noting the following where appropriate:
      1. Educational goals.

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

* + 1. Organized and systematic assessments.

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

* + 1. Use of assessment results.

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

* 1. Identify any challenges or concerns related to the accredited institution’s compliance with requirements related to educational effectiveness assessment:

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

1. **Planning, Resources, and Institutional Improvement**

Provide an analysis of how the accredited institution will maintain compliance with Standard VI: Planning, Resources, and Institutional Improvement, noting the following where appropriate:

1. Proposed organizational structure enables the institution to achieve mission and goals and is sufficient in size and staffing.

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

1. Decision-making process.

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

1. Strategic planning and assessment processes.

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

1. Financial implications of the complex substantive change and how the financial analysis aligns with enrollment projections.

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

1. Describe how the institution has demonstrated sufficient resources to support the complex substantive change, including resources relating to instructional, academic support, student support, and administrative support.

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

* 1. Identify any challenges or concerns related to the accredited institution’s compliance with requirements related to planning, resources, and institutional improvement.

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

1. **Governance, Leadership, and Administration**

Provide an analysis of how the accredited institution will maintain compliance with Standard VII: Governance, Leadership, and administration, noting the following where appropriate:

1. How the complex substantive change will impact governance and administration.

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

1. Policies and procedures and other assurance in place that enable the institution to avoid any real or apparent conflicts of interest as they related to management, administrators, and staff.

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

1. Policies and procedures to evaluate the institution’s ability to operate effectively.

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

1. Significant changes in the distribution of ownership shares held by any related entity and other investors associated with the complex substantive change.

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

1. Governance structure ensures representation and how the institution, the Governing Board, and other governing bodies will operate with sufficient autonomy.

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

1. Parties Involved in the Transaction.

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

1. Related entities and the flow of funding to or from the institution and other financial aspects of the relationship with the related entity.

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

1. Review of *Related Entities Disclosures and Certification Statemen*t.

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

**Section D: Review of Third-Party Comments**

If third-party comments were received in accordance with Commission policy and procedures, describe the process the evaluators used to review them.

*If the third-party comments result in a recommendation or requirement, the team will include those requirements in the proposal for action in the Team Chair’s Confidential Brief.*

***NOTE: Section D should not include a summary of the third-party comments.***

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

1. Did the institution indicate monitoring with any other agencies (accrediting, federal, state, etc.)?

No

Yes

1. If yes, note the monitoring and indicate how it influenced, if at all, the action being recommended.

Click or tap here to enter text.

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

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| --- | --- | --- |
| **Documentation of Required Approvals:** | | |
| Name of Agency/  type of approval | Documentation Submitted Yes/No | Date Expected/Status Update if not yet obtained |
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1. Was sufficient documentation of all required approvals provided?

No

Yes

1. Provide the status of all required approvals. Indicate if there are any concerns related to approvals.

Click or tap here to enter text.

* *The Commission must receive all required approvals or have sufficient documentation that a required approval has been submitted to the agency and is underway.*
* *If an approval is not required, the institution should provide sufficient documentation that approval is not required (i.e. written letter from the agency stating that approval is not required).*
* *The Commission action will request a supplemental information report (SIR) and will require the submission of documentation of outstanding required approvals*.

**Section G: Required Disclosures**

1. Was the Required Disclosures section completed?

No

Yes

1. Are there any areas identified in the disclosures section that raise concerns?

Click or tap here to enter text.

**Section H: Checklist and Certifications**

1. Was the checklist and certification completed and signed?

No

Yes

1. Are there any areas identified in the certifications section that raise concerns?

Click or tap here to enter text.