**Substantive Change Request Form**

*Effective* *Date: July 1, 2023*

**No. 10b Establishment, Relocation, Reclassification to Additional Location or Revised Second Chance Pell ESI**

**Tier II**

An additional location is defined as a domestic or international physical facility or location that is geographically separate from the main campus and within the same ownership structure of the institution, and at which the institution will offer at least 50 percent of an educational program that is credit-bearing or Title IV eligible. An additional location may be a classroom building, clinic, hospital, hotel, office building, shopping center, high school, church, or any other appropriate type of facility where instruction can take place as long as the 50 percent applies (a student may complete at least 50 percent of a credit-bearing or Title IV eligible educational program at the location). Please see the *Substantive Change Guidelines* for a more detailed description and examples.

An additional location participates in Title IV programs only through the certification of the main campus. The Commission utilizes the federal definition of additional location in *34 CFR § 600.2* and will conform its designation to match the Secretary of Education’s if it learns its designations diverge in accordance with federal regulation *34 CFR § 602.24(f)(1-3).*

The Commission’s requirements for substantive change include the establishment of a new additional location, or the relocation or reclassification of an existing location.

A relocation is moving an existing approved additional location to any new physical location or address, regardless of the geographic distance between the two locations. A relocation is the closure of the existing site and the opening of another site.

A reclassification is when the educational offerings at the location change enough that it must be reclassified to a new category (see definitions of main campus, branch campus, additional location, or other instructional site in the Commission’s *Substantive Change Policy and Procedures*). An additional location must be in existence at least 2 years before it may be reclassified to a main campus or branch campus (federal regulation 34 CFR § 600.8)

**Review and Organize**

* Read the [Substantive 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=), [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 concise 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. **Submissions exceeding 100 pages will be returned to the institution for editing and must be resubmitted.**
* All attachments should be labeled appropriately. The form and the attachments should be combined into a **single bookmarked PDF document**.

**Submit**

* Submit the substantive change request form in the 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 **sub-type of change**:

Establishment of Additional Location (the establishment of a new location)

Domestic Additional Location

International Additional Location

Revised Second Chance Pell Experimental Sites Initiative (SCP ESI)

*The Second Chance Pell Experimental Sites Initiative is for incarcerated individuals who wish to continue their education through prison education programs. Title The Commission is following guidance the USDE issued on April 18, 2023, for the revised experiment: https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-04-18/invitation-participate-revised-second-chance-pell-experiment-under-experimental-sites-initiative. The revised experiment will allow participating institutions to continue offering their current programs to confined or incarcerated individuals for up to 3 award years while they work through the application and approval process for the PEP(s) they wish to offer under the new regulatory provisions.*

Has the institution been approved by USDE to participate in the revised Second Chance Pell ESI?

YES If yes, please provide the written documentation from USDE in the approvals section (letter of intention and amended program participation agreement).

NO If no, the Commission will only include the additional location within the institution’s scope of accreditation and cannot provide approval of the location as an ESI.

Relocation (moving an existing approved additional location to any new physical location or address)

Reclassification (changing the educational offerings at the location enough that it must be reclassified to a new category)

1. Provide name and complete physical address of **new additional location**:

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

1. **Relocation -** provide the name and complete address of the existing location:

***Note****: The address provided here will be listed in the secure MSCHE portal and on the institution’s statement of accreditation status (SAS). If you participate in Title IV student financial aid programs, you must ensure that you provide the same name and physical address to MSCHE that you will use in the E-Application. The name and address in the MSCHE secure portal must match USDE record*s.

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

1. **Reclassification** - what is the change from:

Main Campus  Branch Campus  Other Instructional Site

1. Describe the new **facility** e.g., square footage, number of classrooms, student, and faculty spaces, etc.

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

1. Rapid growth in the number of additional locations:
   1. Number of new additional locations opened by the institution in this fiscal year (Jul 1 – Jun 30):

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

\**The Commission requires a substantive change site visit to any additional location if the institution meets the definition of rapid growth in the number of locations. The Commission defines rapid growth in the number of locations as establishing more than five additional locations within one fiscal year (Jul 1 – Jun 30). The Commission will visit the 6th additional location that is opened and any additional locations that are opened subsequently.*

* 1. Describe how the institution will maintain educational quality while experiencing rapid growth in the number of additional locations:

Click or tap here to enter text.

1. **Needs Analysis****:** Explain the need for the proposed substantive change, including details about the process(es) for identifying the need. (*Label attachment* ***Needs Analysis***)

*(In a narrative briefly summarize how the need for the new additional location was developed through appropriate collaborative participation, including consultation with key institutional stakeholders, e.g., faculty, staff, administration, students, board of trustees, community, employers, etc.*

*Examples of evidence: market analysis; student surveys; national trends; employment statistics; student demands; assessment and planning documentation; documentation of discussions of assessment results by stakeholders; documentation of discussions with community partners about the proposed 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 instruction will commence at the new additional location. (*Label attachment* ***Timeline***)

*[****Note****: After the Commission acts on this substantive change request and instruction commences, you must go the MSCHE Institution Portal and enter the actual date (Month, day, year) that instruction commence as an additional location; and if relocating you must enter the actual end date instruction cease at the old additional location.]*

1. **Educational Programs Offered****:** List the educational program(s) to be offered at the additional location.

|  |  |  |
| --- | --- | --- |
| **Name of Program including credential level** | **% of program that can be completed at the location** | **# of credit hours** |
| **Click or tap here to enter text.** | **Click or tap here to enter text.** | **Click or tap here to enter text.** |
| **Click or tap here to enter text.** | **Click or tap here to enter text.** | **Click or tap here to enter text.** |
| **Click or tap here to enter text.** | **Click or tap here to enter text.** | **Click or tap here to enter text.** |

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. **Communication (Standard II):** Describe how the institution will ensure that information regarding the new additional location will be publicized and made known to key institutional stakeholders.

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

1. **Faculty and/or Staffing Needs (Standard VI):** 
   1. Describe the faculty and staff that will be impacted by the new additional location. *(Label attachment* ***Faculty and Staff***)

**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 new location.

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

(*Include in a narrative**: Description of current faculty and staff that will be utilized for the new program, where additional staffing is needed describe how the need will be met, including hiring timetable. Describe student-faculty and/or student-staff ratios compared to the institution as a whole and/or other programs.*

*Examples of evidence: List or chart of faculty and staff associated with the new program including a description of their professional credentials, programmatic accreditor’s standard around faculty qualification, if applicable.)*

1. **Organizational Structure (Standard VII)****:** Describe how the institution will provide oversight of the new additional location, including administrative staff with appropriate credentials and experience. (*Label attachment* ***Organizational Structure***)

*(**Include in a narrative: Description of administrative staff, include professional qualifications, who will be providing services or oversight of the proposed change including roles and responsibilities.*

*Examples of evidence: Organization chart with institution and/or unit levels relating to proposed change*).

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

1. **Student Population (Standard IV):** Describe the target population for the new additional location, including description of current student population demographics.

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

1. **Support of the Student Experience (Standard IV):** 
   1. Briefly describe how the institution will ensure that faculty and students will have access to resources that are equitable or similar to those at the main campus.

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

* 1. Describe the impact on academic and student services programming.

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

1. **Financial and Risk Analysis (Standard VI):**
2. Provide an analysis of the financial impact of the new additional location on the institution. Include three-year financial projections. (*Label attachment* ***Financial Projections***)

*(Include in a narrative: Financial analysis with an explanation of assumptions, projections of costs and revenues, and planned revenues and costs; narrative of budgeting and planning processes and how they will incorporate institutional changes associated with the proposed substantive change; net revenue statement associated with proposed change.*

*Examples of evidence: Three-year financial projections associated with the proposed substantive change).*

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

1. Provide an analysis of risk factors that might impact the successful implementation of the change.

*(**Include in a narrative: Budgeting and planning processes and how they will incorporate institutional changes associated with the proposed substantive change; references to and/or evidence of institutional and/or unit “SWOT” analyses*).

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

1. Include here an analysis of enrollment projections as they relate to the additional location. Include three-year enrollment projections. *(Label attachment* ***Enrollment Planning***)

(*In a narrative* *include: Brief analysis of enrollment projections for the proposed additional location.*

*Examples of evidence**: Three-year enrollment projections).*

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

1. **Organizational Capacity (Standard VII):** Explain how the institution plans to provide appropriate resources to ensure overall sustainability and quality of the new additional location. Please address topics such as adequate facilities, equipment, and technology, as well as how this additional location is considered in the institution’s facilities master plan.

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

1. **Institutional Improvement and Planning (Standard VI):** Describe how the additional location 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. **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. **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.

**International Additional Locations**

*The Commission will conduct a legal review of the international contract and the role of any separate legal entity in the delivery of educational programs. The purpose of the review is to determine any implications on the institution’s ability to maintain oversight and control of the program, location, or institution which would adversely affect the institution’s ability to sustain ongoing compliance.*

1. Describe the requirements of the foreign legal jurisdiction for an institution to establish an additional location.

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

* 1. Does the foreign legal jurisdiction require the establishment of a separate legal entity (i.e., unaccredited third party) that will be directly involved in the delivery of educational programs?

NO  YES

* 1. If a contract is required, attach a copy of the signed contract in its final form. (Label attachment **Contract**)
  2. Describe the conditions of the contract including the roles and responsibilities of the parties involved (institution, separate legal entity, third parties). Consider Standard VII.

Click or tap here to enter text.

* 1. Describe the conditions of the contract and any impact on the institution’s ability to maintain control or oversight of the program, site, or on the institution?

Click or tap here to enter text.

1. How will student access student support services, such as emergency plans, local laws related to creating and operating the site, language and communication differences, and helping students adjust to a new culture, teaching faculty, and availability of resources and oversight.

Click or tap here to enter text.

1. Describe the impact on the additional location in the following areas:
   1. Political climate, local laws, and cultural norms might affect the institution’s ability to deliver a comparable degree program.

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

* 1. Credentials of Teaching Faculty

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

* 1. Availability of Resources

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

* 1. Effects of Distance on Oversight

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

* 1. Language and Communication Issues

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

1. Describe how the member institution will provide protections of student records in accordance with the Commission’s policy *International Programs Offered by Accredited Institutions*.

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

**Section C: 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 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  (*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* 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 the Commission will not approve a substantive change that will adversely affect 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*