



Middle States Commissions on Elementary and Secondary Schools
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POLICY 5.6 SUBSTANTIVE CHANGES

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5.6.1. General

- a. When an institution is accredited by the Commissions on Elementary Schools and/or the Commission on Secondary Schools, that action applies to the institution and its programs, policies, operations, resources, etc. existing at the time of the Commission(s)' action.
- b. While the decision to modify an institution is an institutional prerogative and responsibility, the Commissions are obligated to determine the effect of any substantive change to the institution on the quality, integrity, and effectiveness of the total institution and upon which accreditation was granted.
- c. Accreditation and candidacy are subject to modification or rescission in the event of substantive changes the Commissions reasonably determine require such actions.
- d. The Commissions on Elementary and Secondary Schools are institutional accreditors. A principle of institutional accreditation is that everything within the institution is included in the institution's accreditation. Conversely, anything done without appropriate concern for consistency with an institution's stated mission and concern for quality and integrity may threaten the accreditation status of the entire institution.
- e. Substantive changes are not automatically included in an institution's accreditation or candidate status and, therefore, require a review of the accreditation or candidate status of the institution. Therefore, institutions planning a substantive change are required to inform the Commission(s) by which it is accredited (Commission on Elementary Schools and/or Commission on Secondary Schools) following the procedures in this policy.
- f. The Commissions reserve the right to rescind approval of a substantive change or other Commission action if subsequent developments might have affected the Commission(s)' decision.

- g. Because branch campuses and additional locations may operate with some independence from the main campus (including the resources available on each campus), the Commission(s) may require a branch campus or additional location to submit a Request for Approval of a Substantive Change even if the subject of the Request has been approved for inclusion in the accreditation of the main campus.

5.6.2. Definition of a Substantive Change.

5.6.1.1. A substantive change is a change of such magnitude as to alter significantly the institution's mission, goals, scope of its offerings, autonomy, sponsorship, and/or the locus of control over the institution. This includes an institution's plans to offer programs in other locations and/or to change the geographic area(s) served.

5.6.1.2. If an institution is uncertain whether a proposed change is substantive, the institution should contact the Commissions' staff with preliminary information regarding 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 will advise the institution in writing of its decision.

5.6.1.2. Within this policy the default definitions and requirements apply to all institutions accredited by the Commission on Elementary Schools and/or the Commission on Secondary Schools.

5.6.3. Requests for Approval of a Substantive Change.

5.6.3.1. Substantive changes that are initiated subsequent to the most recent awarding of candidate or accredited status **are not** automatically included in the institution's accredited or candidate status.

5.6.3.2. Accredited and candidate institutions must submit a Request for Approval of a Substantive Change to the appropriate Commission(s) describing the requested change, the rationale for the change, the impact of the change on the quality of education offered by the institution, and providing documentation supporting the need for the change. The form for submitting a Request for Approval of a Substantive Change is included as Appendix A to this policy.

5.6.3.3. Requests for Approval of a Substantive Change shall be submitted to the President of the Commissions according to the time frame noted for each type of substantive change.

5.6.4. Review of Requests for Approval of a Substantive Change.

5.6.4.1. A Request for Approval of a Substantive Change is submitted to the President of the Commissions who will determine whether the institution's change falls within the provisions of this policy and, if so, the actions to be taken by the Commission's staff in response to the request.

5.6.4.2. Substantive Change requests are reviewed by the Commission's staff and acted on by the appropriate Commission(s) or by their Executive Committees.

5.6.4.3. Onsite Visits.

- a. A Request for Approval of a Substantive Change that involve one or more of the following changes requires an onsite visit within the time frame noted for each type of substantive change:
 - 1) Change in legal status, ownership, sponsorship, and/or control;
 - 2) Opening of a branch campus;
 - 3) Opening of an additional location if the institution has three or fewer additional locations approved by the Commission(s);
 - 4) Opening of an additional instructional site if the institution has three or fewer instructional sites approved by the Commission(s);
 - 5) Merger of two or more institutions, or division of an institution into two or more institutions.

5.6.5. Action by the Commission(s).

5.6.5.1. If, upon initial review by Commission(s)' staff, the staff determines that the Request for Approval of a Substantive Change does not have sufficient information or detail for the Commission to consider the Request, the staff shall request the institution to re-submit the substantive change request with the additional information specified by the staff.

5.6.5.2. If the President of the Commissions determines that the substantive change should not be included within the scope of an institution's accreditation, the President may recommend that the Commission(s) denies the institution's request to include the change within its accreditation. The institution may then re-submit the substantive change request after the Commission(s)' concerns are addressed.

5.6.5.3. The Commission(s) reserve the right to decline to entertain a substantive change request by any institution that is not in compliance with Commissions' Standards for Accreditation, and/or the Commissions' policies, or if the institution's accreditation status is Probationary Accreditation.

5.6.6. Effective Date of Approval of a Substantive Change.

5.6.6.1. The effective date on which a substantive change is included in the institution's accreditation is the date on which the Commission(s) approves the substantive change and is not retroactive.

5.6.6.2. However, if the substantive change is a change in ownership, the effective date of approval may be the date of the change in ownership if the accreditation decision is made within 30 days of the change in ownership.

5.6.7. Failure to Report Substantive Change. Failure of an accredited or candidate institution to request approval of the Commission(s) of a substantive change as required by this policy may be grounds for the Commission(s) to issue a show cause action for the institution to offer reasons why the institution's accreditation should not be removed.

5.6.8. Change to Accreditation Timeline.

5.6.8.1. When the Commission receives a Request for Approval of a Substantive Change, the Commission may determine that the proposed change, if approved, would result in an extensive transformation of the institution from the institution that was granted accreditation in its most recent review, the Commission may, at the time of Substantive Change action, direct the institution to undertake a self-study and seek accreditation/reaccreditation within the time frame prescribed by the Commission(s).

5.6.8.2. At the discretion of the Commission(s) the following changes might be considered substantially extensive for the Commission to request a new comprehensive evaluation of an institution:

- a. A change to the institution's mission and purposes that is so significant that it would result in a substantially different institution from that which was last accredited;
- b. More than one change of ownership within a three-year period;
- c. Significant increase in the student population;
- d. Significant change in the institution's financial stability and/or viability;
- e. Significant change in the mode(s) of delivery of the educational program;
- f. Rapid growth of branch campuses and/or additional locations;
- g. Significant reductions in the institution's—
 - 1) Faculty and staff; and/or
 - 2) Enrolled students.
- h. Takeover of the institution by a state or other governmental agency;
- i. Loss of eligibility to participate in federal Title IV student loan programs.

5.6.8.3. In the case of a change in ownership, the institution or new entity must also demonstrate as part of the substantive change process that it meets all the MSA-CSS Standards for Accreditation.

5.6.9. Types of Substantive Changes Applicable to All Accredited and Candidate Institutions.

- a. The following sections of this policy provide instructions regarding specific changes to an institution that are considered as "substantive" by the Commissions and, therefore, require the institution to submit a Request for Approval of a Substantive Change.
- b. This list is not exhaustive inasmuch as there might be other types of substantive changes to an institution that would require submitting a request for approval prior to the change's being implemented.
- c. If an institution is planning a change that is not included in the following sections and is unsure whether it constitutes a substantive change as defined by this policy, it is the institution's responsibility to consult with the staff of the Commissions before proceeding with any planning.

5.6.10. Any Change in the Established Mission or Objectives of the Institution.

5.6.10.1. A Request for Approval of a Substantive Change must be submitted not later than three months **prior** to the date on which the changed mission and/or objectives will be in effect.

5.6.10.2. A Request for Approval of a Substantive Change must be submitted when an institution plans any change that might affect the mission and/or objectives of the institution, including merger, acquisition, closure, expansion of initiatives, or other events deemed to be significant by the Commission(s), whether or not specifically listed in this policy.

5.6.10.3. Evidence Documentation Required. The following evidence/documentation must be submitted with the Request for Approval of a Substantive Change:

- a. The current and the changed mission
- b. The current and the changed goals

5.6.11. Any Change in the Legal Status, Form of Control, or Ownership of the Institution. A Request for Approval of a Substantive Change must be submitted when an institution plans changes to the legal status, form of control, and/or ownership of the institution include sale of a proprietary institution or beginning or ending public sponsorship and control.

5.6.11.1. The Request for Approval of a Substantive Change must be submitted not later than three months *prior* to the date on which the legal status, form of control, and/or ownership of the institution will be changed.

5.6.11.2. The institution must notify the Commission and submit a request for approval of a substantive change as soon as it is aware of the potential change, such as negotiations for transfer of ownership.

5.6.11.3. The Commission will conduct an on-site visit to an institution that plans to undergo a merger, change in legal status, change of ownership, or other change that resulted in a change of control as soon as practicable, but not later than six months after the change of ownership.

5.6.11.4. Definitions: The following definitions apply –

- a. Legal Status. Legal status refers to a change in the legal definition of a school, system of schools, or company/corporation, which is usually a change from a for-profit organization to a non-profit organization or vice versa.
- b. Control. Control refers to the possession, direct or indirect, of the power to direct or cause the direction of the management and policies of a corporation, partnership, or individual, whether through the ownership of voting securities, by contract, or otherwise.
 - 1) At some candidate, or accredited institutions, the governing body shares decision-making responsibility with one or more non-accredited “related entity” concerning functions and operations, such as finances, planning, governance, budget and approval processes, recruitment, information systems, or employee compensation. This policy is intended to ensure that the Commission(s) receives appropriate assurances and sufficient information and documentation to determine whether such institutions comply with Commissions’ Standards for Accreditation and policies.
 - 2) A related entity may be a corporate parent, institutional groups, system administration or board, religious sponsor, funding sponsor (which, in some cases, may include an equity or investment fund) or other entity that can affect decisions related to accreditation.
 - 3) Ordinarily, local, county, and state legislatures, other accreditors, local advisory boards, and government agencies are not related entities.
- c. Ownership. Ownership or ownership interest refers to a legal or beneficial interest in an entity, or a right to share in the profits derived from the operation of an entity. The term does not include the interests of a mutual fund that is regularly and publicly traded, an institutional investor, or a profit-sharing plan in which all employees of an entity may participate.
 - 1) A change in ownership of an institution that results in a change of control may include, but is not limited to merger of two or more eligible institutions, conversions of the institutions from a for-profit to a nonprofit institution, sale of the institution, transfer of the controlling interest of stock of the institution or its parent corporation, transfer of the liabilities of an institution to its parent corporation, or transfer of assets that comprise a substantial portion of the educational business of the

institution (except where the transfer consists exclusively in the granting of a security interest in those assets).

- 2) If the change in ownership is due to the retirement or death of the owner, and the ownership is transferred either to a family member or to a person with ownership interest who has been involved in the management of the institution for at least two years preceding the transfer, the institution should contact the Commissions' staff to determine whether approval or review is necessary.
 - 3) Accredited or candidate status is not automatically transferred or extended to an acquiring institution or organization; the fact of change in control may itself constitute grounds for modification or termination of status.
- d. The acquisition of any program or location of another institution.

5.6.11.5. Evidence Documentation Required. The following evidence/documentation must be submitted with the Request for Approval of a Substantive Change:

- a. Description of the reasons and rationale for the change in legal status, form of control, and/or ownership of the institution;
- b. Minutes of the meeting(s) at which the governing body approved the change in the legal status, form of control, or ownership of the institution; and
- c. All legal documents related to the change in the legal status, form of control, or ownership of the institution.

5.6.12. Occupying New or Significantly Renovated Physical Facilities. A Request for Approval of a Substantive Change must be submitted when an institution plans to occupy a new or significantly renovated physical facility.

5.6.12.1. The Request for Approval of a Substantive Change must be submitted not later than three months *prior* to the date on which the new/renovated physical facility will be occupied.

5.6.12.2. Prior to submitting the Request to the Commission(s) for action, the President shall direct that an onsite visit is conducted to ensure the new/renovated physical facility meets the Facilities and Health and Safety Standards for Accreditation. The report of the onsite visitor shall accompany the Request for Approval of a Substantive Change throughout the review and decision phases.

5.6.12.3. The President may waive the requirement for an onsite visit if the institution is able to supply the following:

- a. Certificate of Occupancy issued by the appropriate civil authority;
- b. Records of any fire and safety inspections required by the appropriate civil authority to indicate the new/renovated physical facility meets all applicable fire and safety codes of the appropriate civil authority; and
- c. Photographs of the new/renovated facility.

5.6.12.4. Evidence Documentation Required. The following evidence/documentation must be submitted with the Request for Approval of a Substantive Change:

- a. Certificate of Occupancy issued by the appropriate civil authority;
- b. Records of any fire and safety inspections required by the appropriate civil authority to indicate the new/renovated physical facility meets all applicable fire and safety codes of the appropriate civil authority; and
- c. Photographs of the new/renovated facility.

5.6.13. Establishing a Branch Campus. A Request for Approval of a Substantive Change must be submitted when an institution plans to establish a branch campus.

5.6.13.1. The Request for Approval of a Substantive Change must be submitted not later than six months *prior* to the date on which the branch campus will be operational.

5.6.13.2. MSA-CESS Policy 3.1, Scope and Category of Membership defines a branch campus as a location of an institution that is geographically apart from the main campus of the institution. A branch campus may be within the United States or outside the United States. A location is a branch campus if it meets all or most of the following criteria:

- a. With the main campus and other branch campuses, is part of a single legal and/or ownership framework;
- b. Is governed by the same governing body as the main campus and other branch campuses;

- c. Legally, is part of the same financial entity as the main campus and other branch campuses (although may have a separate budget);
- d. *For Public Schools Only*—Has not been assigned its own school number by the state or other civil authority in whose jurisdiction it operates;
- e. *For Non-Public Schools Only*—Is not recognized as a single entity by a school system or corporation under whose authority it operates;
- f. The head administrator or leader of the main campus oversees the operations of the campus;
- g. Offers a complete educational program similar to the program of the main campus and that leads to a diploma, certificate, or other recognized educational credential;
- h. Serves essentially the same client pools as the main campus;
- i. Is sufficiently accessible to the main campus and other branch campuses to make possible genuine interchange of personnel, resources, and ideas on a frequent basis;
- j. Employs similar types of staff members as the main campus and other branch campuses;
- k. Offers to the staff similar professional development opportunities as are provided at the main campus and other branch campuses;
- l. Provides student services (special needs, ELL, guidance and counseling, health care, etc.) similar to those provided by the main campus and other branch campuses;
- m. Provides resources (food services, security services, transportation, cleaning, physical plant, technology, information resources, etc.) similar to and of the same quality as those provided at the main campus and other branch campuses; and
- n. Has a similar quality and atmosphere of student and community life (personal and group relationships, communication and dissemination of information to students and parents, traditions, co-curricular activities, etc.) as the main campus and other branch campuses.

5.6.13.3. An addition to the annual dues is charged to an institution for each branch campus. In addition, branch campuses may require additional costs to the institution for hosting an onsite accreditation team visit. Increased costs might be due to the number of branch campuses, the size and complexity of the institution and its branch campuses, and/or the distance of the branch campus(es) from the main campus of the institution.

5.6.13.4. The Commission(s) will include a branch campus within the scope of the institution's accreditation only after it evaluates the information and data submitted in the request for approval and takes whatever other actions it deems necessary to determine that the branch campus has sufficient educational, financial, operational, management, and physical resources to allow the institution to continue to meet the Commissions' Standards for Accreditation.

5.6.13.5. The Commission(s) will conduct an onsite visit to a branch campus as soon as practicable after the receipt of the Request for Approval of a Substantive Change but not later than six months after the branch campus is operational,

5.6.13.6. Evidence Documentation Required. The following evidence/documentation must be submitted with the Request for Approval of a Substantive Change:

- a. Description of the location of the branch campus and its distance from the main campus;
- b. Description of the educational program to be offered at the branch campus;
- c. Description of the physical facilities of the branch campus;
- d. Evidence that the institution has the financial resources need to establish and operate the branch campus;
- e. Budget for operation of the branch campus;
- f. Description of any additional personnel required for the branch campus; and
- g. Description of how the branch campus will be managed.

5.6.14. Establishing an Additional Location. A Request for Approval of a Substantive Change must be submitted when an institution plans to establish an additional location at which at least 50 percent of one or more of the components of the institution's educational program will be offered.

5.6.14.1. The Request for Approval of a Substantive Change must be submitted not later than three months *prior* to the date on which the additional location will be operational.

5.6.14.2. The Commission defines an additional location as a location, other than a branch campus, that is geographically apart from the main campus and at which an institution offers at least 50% of one or more of the components of its educational program.

5.6.14.3. The addition of such a location must be preapproved by the Commission(s) unless the Commission(s) determines, and issues a written determination stating that the institution has —

- a. Successfully completed at least one cycle of accreditation of maximum length offered by the Commissions and one renewal, or has been accredited for at least ten years;
- b. At least three additional locations that the Commission(s) has approved; and
- c. Met criteria established by the Commissions indicating sufficient capacity to add additional locations without individual prior approvals, including at a minimum satisfactory evidence of a system to ensure quality across a distributed enterprise that includes:
 - 1) Clearly identified academic control;
 - 2) Regular evaluation of the locations;
 - 3) Adequate faculty, facilities, resources, and academic and student support systems;
 - 4) Financial stability; and
 - 5) Long-range planning for expansion.

5.6.14.4. The Commission shall conduct an on-site visit within six months of the approval of the substantive change if the institution:

- a. Has a total of three or fewer additional locations;
- b. Has not demonstrated to the Commission(s)' satisfaction that it has a proven record of effective educational oversight of additional locations; or
- c. Has been placed on warning, probation, or show cause by the Commission(s) or is subject to some limitation by the Commission(s) on its accreditation.

5.6.14.5. If an institution has approval of the Commission(s) for three additional locations, a request for preapproval is not required for additional locations.

- a. However, an institution establishing more than three additional locations must notify the Commission(s) in writing within 30 calendar days of the establishment of a new location and attest that the location meets all of the Commission(S)' requirements for maintain quality in the components of its educational program that are offered at the location.

- b. For institutions with more than three approved additional locations, the Commission(s) shall conduct visits to a representative sample of the additional locations at least once every three years.
- c. The Commission may conduct additional reviews as it deems appropriate, such as unannounced inspections.

5.6.14.6. Evidence Documentation Required. The following evidence/documentation must be submitted with the Request for Approval of a Substantive Change:

- a. Description of the location of the additional location and its distance from the main campus;
- b. Description of the educational program to be offered at the additional location;
- c. Description of the physical facilities of the additional location;
- d. Evidence that the institution has the financial resources need to establish and operate the additional location;
- e. Budget for operation of the additional location;
- f. Description of any additional personnel required for the additional location; and
- g. Description of how the additional location will be managed.

5.6.15. Adding, Discontinuing, or Changing a Major Component of the Educational Program.

5.6.15.1. A request for approval of a substantive change must be submitted when there are plans to change the institution's educational program by adding a major component, discontinuing a major component, or otherwise changing a major component such that the educational program will be significantly different in content than it was when the institution was last accredited.

5.6.15.2. The Request for Approval of a Substantive Change must be submitted not later than six months *prior* to the date on which the addition, deletion, or change will be effective.

5.6.15.3. Major Component of the Educational Program. A major component of the educational program is a) a major curricular area of study (e.g., language arts, Spanish as a world language, music, etc.) or b) a program of study such as

Advanced Placement® , International Baccalaureate, etc.). a within the institution’s overall educational program

5.6.15.4. Adding a Major Component of the Educational Program. A Request for Approval of a Substantive Change must be submitted when an institution plans to add a major component of the educational program (e.g., addition of a program of Advanced Placement® courses, establishment of the International Baccalaureate Program, addition of an alternative school, etc.)

5.6.15.5. Discontinuing a Major Component of the Educational Program. A Request for Approval of a Substantive Change must be submitted when an institution plans to discontinue permanently a major component of the educational program that was included in the institution’s educational program when the Commission(s) last accredited/reaccredited the institution.

- a. If the institution plans to discontinue a program permanently, evidence must be presented that no students shall be deprived of the opportunity to complete the program(s) in which they are enrolled, either by action of the institution to keep the program operating until all current students have completed the program or by an approved teach-out agreement.

5.6.15.6. Significant Changes to a Major Component of the Educational Program. A Request for Approval of a Substantive Change must be submitted when an institution plans to change a major component of the educational program such that it will be significantly different in content than it was when the institution was last accredited.

5.6.15.7. Evidence Documentation Required. The following evidence/documentation must be submitted with the Request for Approval of a Substantive Change:

- a. Adding a Major Component.
 - 1) The rationale for adding the component;
 - 2) The scope and sequence for the added component. If none, explain;
 - 3) Description of the institution’s provision of personnel required to deliver the added component; and
 - 4) Description of the physical facilities available for delivering the added component.

- b. Discontinuing a Major Component.
 - 1) Description of the major component to be discontinued'; and
 - 2) The rationale for discontinuing the major component.
 - c. Change to a Major Component.
 - 1) Description of the change(s) to be made; and
 - 2) Rationale for making the change(s).
- 5.6.16. Adding or Discontinuing a Grade Level(s) or Changing the Institution's Grade Level Configuration.

5.6.16.1. A request for approval of a substantive change must be submitted when there are plans to add, or discontinue a grade level(s) or to change the institution's grade level configuration.

5.6.16.2. The Request for Approval of a Substantive Change must be submitted not later than six months *prior* to the date on which the addition, deletion, or change will be effective.

5.6.16.3. Evidence Documentation Required. The following evidence/documentation must be submitted with the Request for Approval of a Substantive Change:

- a. Adding a Grade Level or Grade Levels.
 - 1) Grade level of grade levels to be added;
 - 2) Rationale for adding the grade level or grade levels;
 - 3) Description of the institution's plan for incorporating the additional grade(s) into the existing institution and educational program;
 - 4) Description of the institution's provision for personnel required to serve the additional grade(s);
 - 5) Description of the physical facilities available for serving the additional grade(s).
- b. Discontinuing a Grade Level or Grade Levels.
 - 1) Grade level(s) to be deleted;
 - 2) Rationale for deleting the grade level(s); and

- 3) Description of the institution's plan for ensuring students currently enrolled in the grade level(s) to be deleted are able to continue and/or complete their education.
- c. Changing the Institution's Grade Level Configuration.
- 1) Description of the proposed grade level configuration;
 - 2) Rationale for changing the grade level configuration; and
 - 3) Description of changes, if any, that must be made in the institution's operation, personnel, physical facilities, and finances to serve the changed grade level configuration.

5.6.17. Change to the Institution's Financial Stability and/or Viability.

5.6.17.1. A request for approval of a substantive change must be submitted when there is a significant change to the institution's financial stability and/or viability such that the institution's ability to continue operating as an educational institution in the short and long term is called into question.

5.6.17.2. The Request for Approval of a Substantive Change must be submitted not later than one month after the determination has been made that there is a significant change in the institution's financial stability and/or viability.

5.6.17.3. Changes to the institution's financial stability that are considered to be a substantive change include but are not limited to the following:

- a. Expenditures exceed revenues to a significant degree for three or more years;
- b. Finances are not stable, and projections indicate continuing instability;
- c. Based on the history of the institution's revenues and expenditures, the institution has demonstrated fiscal instability over the last three years, and projections indicate continuing instability; and
- d. The institution has major contingent liabilities or on-going litigations that potentially could affect the institution's ability to continue operation.

5.6.17.4. Evidence Documentation Required. The following evidence/documentation must be submitted with the Request for Approval of a Substantive Change:

- a. Description of the significant change in the institution's financial stability and/or viability and its effect on the institution's ability to continuing operating as an educational institution in short and long term;
- b. Statement of financial revenues and expenditures for the current and two previous fiscal years;
- c. Most recent audit or financial review by an agency external to the institution;
- d. Statement of current assets and liabilities;
- e. Description of plans to stabilize the institution's finances and to make the institution financially viable; and
- f. Projected financial revenues, expenditures, assets, and liabilities for the next three fiscal years.

5.6.18. Merger of Two or More Institutions or Division of an Institution into One or More Institutions.

5.6.18.1. A request for approval of a substantive change must be submitted when there is a plan to merge two or more institutions or to divide an accredited institution into one or more institutions.

5.6.18.2. The Request for Approval of a Substantive Change must be submitted not later than six months *prior* to the date on which the the planned merger or division will occur.

5.6.18.3. Definition of a Merged Institution Eligible for This Policy: A merged institution is one that is the result of two or more institutions combining into a single entity. At least one of the original institutions involved in the reorganization must be an accredited institution in good standing with the Commission(s).

5.6.18.4. Definition of a Divided Institution Eligible for This Policy: A divided institution is one that separates into two or more separate institutions. The original institution involved in the reorganization must be an accredited institution in good standing with the Commission(s).

5.6.18.5. Transferring Accreditation to a Merged Institution: In order to transfer accreditation to the merged institution, the merged institution must demonstrate the following:

- a. The fundamental philosophy, mission, and purposes of the accredited institution are unchanged;
- b. The governance and ownership of the accredited institution are unchanged;
- c. The organizational design and staff of the merged institution are substantially unchanged or is comparable;
- d. The educational program, services, and activities of the merged institution are substantially unchanged or are comparable;
- e. The merger institution remains fiscally stable and viable; and
- f. Copies of documents showing approval of the merger by the institutions' governing authorities.

5.6.18.6. Transferring Accreditation to Divided Institutions: In order to transfer accreditation to the accredited institution to the institution(s) resulting from the divided accredited institution, the resulting institutions must demonstrate the following:

- a. The fundamental philosophy, mission, and purposes of the institutions resulting from the division are unchanged or comparable to those of the accredited institution;
- b. The governance and ownership of the institutions resulting from the division are the same as the accredited institution;
- c. The organizational design and staff of the of the institutions resulting from the division are the same or comparable to those of the accredited institution;
- d. The educational program, services, and activities of the institutions resulting from the division are the same or are comparable to those of the accredited institution;
- e. The institutions resulting from the division are fiscally stable and viable; and
- f. Copies of documents showing the approval of the division by the resulting institutions' governing authorities.

5.6.18.7. An onsite visitor may be appointed to validate that Commission(s) standards are met in the newly reorganized institution. Costs of any visit shall be borne by the institution(s).

5.6.18.8. Establishing the Accreditation Timeline for the Newly Reorganized Institution. Future accreditation activities shall typically be based on the accreditation timeline of the institution originally accredited by the Commission(s).

5.6.18.9. Extent of Reorganization: A member institution that is so reorganized that it is no longer eligible under the set of Standards for Accreditation by which it entered the Commissions on Elementary and Secondary Schools must apply for new membership as a candidate member.

5.6.18.10. Evidence Documentation Required. The following evidence/documentation must be submitted with the Request for Approval of a Substantive Change:

- a. Merger of Two or More Institutions.
 - 1) Copies of documents showing approval of the merger by the institutions' governing authorities.
 - 2) *Evidence of the following*:
 - a) The fundamental philosophy, mission, and purposes of the institutions resulting from the division are unchanged or comparable to those of the accredited institution;
 - b) The governance and ownership of the institutions resulting from the division are the same as the accredited institution;
 - c) The organizational design and staff of the of the institutions resulting from the division are the same or comparable to those of the accredited institution;
 - d) The educational program, services, and activities of the institutions resulting from the division are the same or are comparable to those of the accredited institution;
 - e) The institutions resulting from the division are fiscally stable and viable
 - f) The merged institution meets the Facilities, Health and Safety, and Information Resources Standards for Accreditation.
- b. Division of an Institution into One or More Institutions
 - 1) Copies of documents showing approval of the division by the resulting institutions' governing authorities.
 - 2) *Evidence of the following*:
 - a) The fundamental philosophy, mission, and purposes of the institutions resulting from the division are unchanged or comparable to those of the accredited institution;
 - b) The governance and ownership of the institutions resulting from the division are the same as the accredited institution;

- c) The organizational design and staff of the of the institutions resulting from the division are the same or comparable to those of the accredited institution;
- d) The educational program, services, and activities of the institutions resulting from the division are the same or are comparable to those of the accredited institution;
- e) The institutions resulting from the division are fiscally stable and viable
- f) The resulting institutions meet the Facilities, Health and Safety, and Information Resources Standards for Accreditation.

5.6.19. Takeover of Control by the State or Other Governmental Authority.

5.6.19.1. A request for approval of a substantive change must be submitted if a state or other governmental authority takes control over the governance and operation of an accredited or candidate institution.

5.6.19.2. The Request for Approval of a Substantive Change must be submitted immediately upon the decision to take over the but not later than one month after the takeover has been implemented.

5.6.19.3. Upon receipt of such a request, the Commission(s) shall conduct an investigation within 60 calendar days to determine whether the takeover has resulted in changes to the institution that make the institution no longer able to meet the Standards for Accreditation and/or other requirements of the Commission(s) upon which the institution's most recent accreditation was based.

5.6.19.4. Upon conclusion of the investigation, a report shall be submitted to the appropriate Commission(s) for action to affirm or to change the institution's accreditation.

5.6.19.5. Evidence Documentation Required. The following evidence/documentation must be submitted with the Request for Approval of a Substantive Change:

- a. Description of the bases upon which the takeover is based;
- b. Copies of all documents related to the takeover by the state or other governmental authority; and

- c. Evidence to demonstrate the institution taken over by the state or other governmental authority will continue to meet the Standards for Accreditation.

5.6.20. Closing an Entire Institution.

56.20.1. A request for approval of a substantive change must be submitted if the institution's governing authority plans to close the entire institution.

5.6.20.1. The Request for Approval of a Substantive Change must be submitted at least six months *prior* to the date on which the closing would be effective.

5.6.20.2. Evidence Documentation Required. The following evidence/documentation must be submitted with the Request for Approval of a Substantive Change:

- a. Rationale for closing the institution.
- b. The institution's plans to ensure that currently enrolled students will be provided reasonable opportunities to complete their program
- c. Copies of documents showing approval of the closing by the institution's governing authority.

5.6.21. Closing a Branch Campus or Additional Location.

5.6.21.1. A request for approval of a substantive change must be submitted if the institution's governing authority plans to close a branch campus.

5.6.21.2. The Request for Approval of a Substantive Change must be submitted at least six months *prior* to the date on which the closing would be effective.

5.6.21.3. Evidence Documentation Required. The following evidence/documentation must be submitted with the Request for Approval of a Substantive Change:

- a. Rationale for closing the branch campus.
- b. The institution's plans to ensure that currently enrolled students will be provided reasonable opportunities to complete their program

- c. Copies of documents showing approval of the closing by the institution's governing authority.

5.6.22. Changing the Method of Delivery.

5.6.22.1. A request for approval of a substantive change must be submitted if the institution plans to increase the percentage of programs/courses delivered by a distance education modality to 50% or more of the institution's programs/courses.

5.6.22.2. The Request for Approval of a Substantive Change must be submitted at least six months *prior* to the date on which the change in the method of delivery is to be implemented. The 50% standard includes only programs/courses offered in their entirety via a distance education modality, not courses delivered with a blended delivery method.

5.6.22.3. Evidence Documentation Required. The following evidence/documentation must be submitted with the Request for Approval of a Substantive Change:

5.6.22.4. An accredited institution that plans to increase the percentage of its programs/courses by a distance education modality to 50% or more of those programs/courses must submit a request for approval of a substantive change.

5.6.23. Instructions for Submitting a Request for Approval of a Substantive Change

5.6.23.1. Accredited institutions will use the template provided as Appendix A to prepare a Request for Approval of a Substantive Change. The template also includes components in which a Visitor (if required) will write the Visitor's report. The result will be a single document—the institution's Request for Approval of a Substantive Change and the report of a Visitor, if deemed necessary.

5.6.23.2. Organization of the Template. The template includes fonts in three colors:

- a. **BLACK** indicates “boilerplate” text that is not to be changed and is to be included in the Substantive Change Request and report of the Visitor.
- b. **RED** indicates instructions to the institution. **RED** text should be deleted from the Request when it is completed and prior to presenting it to the Middle States Association and the Visitor.

- c. **BLUE** indicates instructions to the Visitor. **BLUE** text will be deleted from the Report by the Visitor when the report is completed and prior to its being presented it to the Middle States Association.
- d. **GREEN** indicates text that must be changed by the institution and/or Visitor, as appropriate, to reflect the appropriate name of and information about the institution. **GREEN** text should be changed to **BLACK** font when the Visitor’s Report is completed and prior to presenting it to the Middle States Association.

5.6.23.3. Where options are presented to the institution or Visitor, enter an “X” to indicate the option selected.

5.6.23.4. The institution is required to answer or respond to all of the requirements that are applicable to the institution.

5.6.23.5. There may be cases in which more spaces are provided in an information/data table than the institution requires. In that case, in the interest of reducing the size of the final document, the institution may delete unused rows. Conversely, the institution may add rows/spaces as needed.

Action	Date	Notes
Initial Adoption by MSA-CSS	April 15, 2011	
Initial Adoption by MSA-CES	October 28, 2011	
Revisions		

**MIDDLE STATES ASSOCIATION OF
COLLEGES AND SCHOOLS**

**COMMISSIONS ON
ELEMENTARY AND SECONDARY
SCHOOLS**

**REQUEST FOR APPROVAL OF A
SUBSTANTIVE CHANGE**

Submitted By

NAME OF INSTITUTION
City, State/Country

REQUEST FOR APPROVAL OF A SUBSTANTIVE CHANGE

A. THE INSTITUTION

Name of Institution		
Mailing Address		
Title and Name of Head of Institution		
Phone No. of Head of Institution		
E-mail Address of Head of Institution		
Name of Contact for Substantive Change Request		
E-mail Address of Contact for Substantive Change Request		
This Institution Serves: [Check all that apply]	<input type="checkbox"/>	Pre-K Students
	<input type="checkbox"/>	Elementary Students
	<input type="checkbox"/>	Middle Students
	<input type="checkbox"/>	Secondary Students
	<input type="checkbox"/>	Postsecondary/Adult Students
Date this Substantive Change Request is submitted		

B. TYPE OF SUBSTANTIVE CHANGE REQUESTED

Indicate on the table below the type of substantive change being reported/requested
[Check all that apply]:

X	Policy 5.6 Reference	Type of Substantive Change
	5.6.10	Any Change in the Established Mission or Purpose of the Institution
	5.6.11	Any Change in the Legal Status, Form of Control, or Ownership of the Institution
	5.6.12	Occupying New or Significantly Renovated Physical Facilities
	5.6.13	Establishing a Branch Campus
	5.6.14	Establishing an Additional Location
	5.6.15	Adding, Discontinuing, or Changing a Major Component of the Educational Program
	5.6.16	Adding or Discontinuing a Grade Level(s) or Changing the Institution's Grade Level Configuration
	5.6.17	Change to the Institution's Financial Stability and/or Viability
	5.6.18	Merger of One or More Institutions or Division of an Institution into One or More Institutions
	5.6.19	Takeover of Control by the State or Other Governmental Authority
	5.6.20	Closing an Entire Institution
	5.6.21	Closing a Branch Campus or Additional Location
	5.6.22	Change in Method of Delivery
	Other [Please describe]	

Date on which the substantive change was or will be effective:	
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C. SPECIAL REQUIREMENTS.

Requests for approval of a substantive change require the documentation for the specific type of change requested as noted below and must be included with this Request.

	5.6.10	Reference MSA-CESS Policy 5.6, §5.6.10. A change to the mission and/or goals of the institution. Copies of all documents relevant to the change(s). <i>(Indicate with an X the documents included. Add additional rows if needed.)</i>
		The hanged mission
		The changed goals
		Other [<i>Please describe</i>]:

	5.6.11	Reference MSA-CESS Policy 5.6, §5.6.11. A change in the legal status, form of control, and/or ownership of the institution. Copies of all documents relevant to the change(s). <i>(Show the name of the included documents below. Add additional rows if needed.)</i>
		Description of the reasons and rationale for the change in legal status, form of control, and/or ownership of the institution.
		Minutes of the meeting(s) at which the governing body approved the change in the legal status, form of control, or ownership of the institution.
		All legal documents related to the change in the legal status, form of control, or ownership of the institution.
		Other [<i>Please describe</i>]:

	5.6.12	Reference MSA-CESS Policy 5.6, §5.6.12. Occupying new or significantly renovated physical facilities. Copies of all documents relevant to the change(s). <i>(Show the name of the included documents below. Add additional rows if needed.)</i>
		Copies of all documents in which the governing body approved occupation or renovation of the physical facility(ies).
		Certificate of Occupancy issued by the appropriate civil authority;
		Records of any fire and safety inspections required by the appropriate civil authority to indicate the new/renovated physical facility meets all applicable fire and safety codes of the appropriate civil authority
		Photographs of the new/renovated facility.
		Other [<i>Please describe</i>]:

	5.6.13	Reference MSA-CESS Policy 5.6, §5.6.13. Establishing a branch campus. Copies of all documents relevant to the change(s). <i>(Indicate with an X the documents included. Add additional rows if needed.)</i>
		Description of the location of the branch campus and its distance from the main campus.
		Description of the educational programs) to be offered at the branch campus.
		Description of the physical facilities of the branch campus.
		Evidence that the institution has the financial resources need to establish and operate the branch campus.
		Budget for operation of the branch campus.
		Description of any additional personnel required for the branch campus.
		Description of how the branch campus will be managed.
		Other [<i>Please describe</i>]:

	5.6.14	Reference MSA-CESS Policy 5.6, §5.6.14. Establishing an additional location. Copies of all documents relevant to the change(s). (<i>Indicate with an X the documents included. Add additional rows if needed.</i>)
		Description of the additional location and its distance from the main campus.
		Description of the educational program to be offered at the additional location.
		Description of the physical facilities of the additional location.
		Evidence that the institution has the financial resources need to establish and operate the additional location.
		Budget for operation of the additional location.
		Description of any additional personnel required for the additional location.
		Description of how the additional location will be managed.
		Other [<i>Please describe</i>]:

	5.6.15	Reference MSA-CESS Policy 5.6, §5.6.15. Adding, discontinuing, or changing a major component of the educational program. Copies of all documents relevant to the change(s). (<i>Indicate with an X the documents included. Add additional rows if needed.</i>)
Adding a Component		
		The rationale for adding the component.
		Scope and sequence for the added component.
		Description of the institution’s provision of personnel required to deliver the component. If none, explain.
		Description of the physical facilities available for delivering the added component.
Discontinuing a Component		
		Description of the component(s) of the educational program to be discontinued.
		Rationale for discontinuing the program

	5.6.15	Reference MSA-CESS Policy 5.6, §5.6.15. Adding, discontinuing, or changing a major component of the educational program. Copies of all documents relevant to the change(s). <i>(Indicate with an X the documents included. Add additional rows if needed.)</i>
Changes to a Component		
	Description of the change(s) to be made.	
	Rationale for making the change(s).	
	Other [<i>Please describe</i>]:	

	5.6.16	Reference MSA-CESS Policy 5.6, §5.6.16. Adding or discontinuing a grade level(s) or changing the institution's grade level configuration. Copies of all documents relevant to the change(s). <i>(Indicate with an X the documents included. Add additional rows if needed.)</i>
Adding a Grade Level of Grade Levels		
	Grade level of grade levels to be added;	
	Rationale for adding the grade level or grade levels;	
	Description of the institution's plan for incorporating the additional grade(s) into the existing institution and educational program;	
	Description of the institution's provision for personnel required to serve the additional grade(s);	
	Description of the physical facilities available for serving the additional grade(s).	
Discontinuing a Grade Level of Grade Levels		
	Grade level(s) to be deleted;	
	Description of the institution's plan for ensuring students currently enrolled in the grade level(s) to be deleted are able to continue and/or complete their education.	
	Grade level(s) to be deleted;	

	5.6.16	Reference MSA-CESS Policy 5.6, §5.6.16. Adding or discontinuing a grade level(s) or changing the institution's grade level configuration. Copies of all documents relevant to the change(s). <i>(Indicate with an X the documents included. Add additional rows if needed.)</i>
Changing the Institution's Grade Level Configuration		
	Description of the proposed grade level configuration;	
	Rationale for changing the grade level configuration; and	
	Description of changes, if any, that must be made in the institution's operation, personnel, physical facilities, and finances to serve the changed grade level configuration	
	Other [<i>Please describe</i>]:	

	5.6.17	Reference MSA-CESS Policy 5.6, §5.6.17. Change to the institution's financial stability and/or viability. Copies of all documents relevant to the change(s). <i>(Indicate with an X the documents included. Add additional rows if needed.)</i>
	Description of the significant change in the institution's financial stability and/or viability and its effect on the institution's ability to continuing operating as an educational institution in short and long term	
	Statement of financial revenues and expenditures for the current and two previous fiscal years.	
	Most recent audit or financial review by an agency external to the institution.	
	Statement of current assets and liabilities.	
	Description of any plans to stabilize the institution's finances and to make the institution financially viable.	
	Projected financial revenues, expenditures, assets, and liabilities for the next three fiscal years.	
	Other [<i>Please describe</i>]:	

	5.6.18	<p>Reference MSA-CESS Policy 5.6, §5.6.18. Merger of two or more institutions or division of an institution into one or more institutions. Copies of all documents relevant to the change(s). <i>(Indicate with an X the documents included. Add additional rows if needed.)</i></p>
Merger of Two or More Institutions.		
	Copies of documents showing approval of the merger by the institutions' governing authorities.	
<i>Evidence of the following:</i>		
	The fundamental philosophy, mission, and purposes of the institutions resulting from the division are unchanged or comparable to those of the accredited institution;	
	The governance and ownership of the institutions resulting from the division are the same as the accredited institution;	
	The organizational design and staff of the of the institutions resulting from the division are the same or comparable to those of the accredited institution;	
	The educational program, services, and activities of the institutions resulting from the division are the same or are comparable to those of the accredited institution;	
	The institutions resulting from the division are fiscally stable and viable	
	The merged institution meets the Facilities, Health and Safety, and Information Resources Standards for Accreditation.	
	Other [Please describe]:	
Division of an Institution into One or More Institutions		
	Copies of documents showing approval of the division by the resulting institutions' governing authorities.	
<i>Evidence of the following:</i>		
	The fundamental philosophy, mission, and purposes of the institutions resulting from the division are unchanged or comparable to those of the accredited institution;	
	The governance and ownership of the institutions resulting from the division are the same as the accredited institution;	
	The organizational design and staff of the of the institutions resulting from the division are the same or comparable to those of the accredited institution;	
	The educational program, services, and activities of the institutions resulting from the division are the same or are comparable to those of the accredited	

	5.6.18	Reference MSA-CESS Policy 5.6, §5.6.18. Merger of two or more institutions or division of an institution into one or more institutions. Copies of all documents relevant to the change(s). <i>(Indicate with an X the documents included. Add additional rows if needed.)</i>
		institution;
		The institutions resulting from the division are fiscally stable and viable
		The resulting institutions meet the Facilities, Health and Safety, and Information Resources Standards for Accreditation.
		Other <i>[Please describe]</i> :

	5.6.19	Reference MSA-CESS Policy 5.6, §5.6.19. Takeover of control by the state or other governmental authority. Attach to this Request copies of all documents relevant to the change(s). <i>(Show the name of the included documents below. Add additional rows if needed.)</i>
		Copies of all documents related to the takeover by the state or other governmental authority.
		Evidence to demonstrate the institution taken over by the state or other governmental authority will continue to meet the Standards for Accreditation.
		<i>Other documents pertaining to the takeover of control.</i>
		<i>Name of Document</i>

	5.6.20	Reference MSA-CESS Policy 5.6, §5.6.20. Closing an entire institution. Copies of all documents relevant to the change(s). (<i>Indicate with an X the documents included. Add additional rows if needed.</i>)
		Rationale for closing the institution.
		The institution's plans to ensure that currently enrolled students will be provided reasonable opportunities to complete their program
		Copies of documents showing approval of the closing by the institution's governing authority.
<i>Other documents pertaining to the closure.</i>		
		<i>Name of Document</i>

	5.6.21	Reference MSA-CESS Policy 5.6, §5.6.21. Closing a branch campus. Copies of all documents relevant to the change(s). (<i>Indicate with an X the documents included. Add additional rows if needed.</i>)
		Rationale for closing the branch campus.
		The institution's plans to ensure that currently enrolled students will be provided reasonable opportunities to complete their program
		Copies of documents showing approval of the closing by the institution's governing authority.
		<i>Name of Document</i>

	5.6.22	Reference MSA-CESS Policy 5.6, §5.6.22. Changing the method of delivery. Copies of all documents relevant to the change(s). <i>(Indicate with an X the documents included. Add additional rows if needed.)</i>
		Rationale for the change in the method of delivery.
		Programs/courses to be affected by the change in the method of delivery.
		Copies of documents showing approval of the change in the method of delivery by the institution's governing authority.
		Other [<i>Please describe</i>]:

D. AFFIRMATION

I certify by my signature below that the statements made in this Request are true and accurate to the best of my ability.

Printed Name of Head of the Institution
Signature of Head of the Institution

FINDINGS OF THE VISITOR/REVIEWER REGARDING THE REQUEST FOR APPROVAL OF A SUBSTANTIVE CHANGE

1.	Does the evidence and documentation presented support and provide acceptable justification for the change(s) for which approval is requested?

2.	What is the evidence that the key stakeholders of this institution support the change(s) for which approval is requested?
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3.	If the change(s) is approved, will the mission of the institution be changed in any significant way? If so, how?

4.	General Comments Regarding the Request for Approval of the Substantive Change

	I have reviewed the institution's Request for Approval of a Substantive Change and the documentation and other evidence presented with the Request.
	I recommend that the requested substantive change is approved.
	I recommend that the requested substantive change is denied for the following reason(s):

Printed Name of Visitor/Reviewer
Signature of Visitor/Reviewer
Date of Visit/Review