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**TO: MSCHE Institutions Needing Distance Education Approval  
State and System Colleagues**  
**FROM: Elizabeth H. Sibolski, President  
Heather F. Perfetti, President-Elect**  
**RE: Expedited Review of Distance Education Substantive Change Requests**  
**DATE: May 4, 2020**

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The Middle States Commission on Higher Education continues to be concerned about the impact of the coronavirus (COVID-19) pandemic and understands that this is a difficult time for our institutions, all students, faculty, staff, and administration, and for the communities our institutions serve. The United States Department of Education (USDE), Office of Postsecondary Education, issued additional guidance on April 3, 2020, encouraging accrediting agencies to develop new policies and procedures to support the rapid approval of distance education programs for institutions working to accommodate students whose enrollment, after June 1, 2020, may be interrupted as a result of the coronavirus (COVID-19).

As a reminder, the Commission reviews and approves substantive change requests six times a year; however, we recognize the timing may not meet the more immediate needs of institutions. Therefore, in addition to the temporary waivers already provided to many of our institutions, the Commission has established temporary procedural modifications to expedite review under the *Substantive Change Policy and Procedures* and *Substantive Change Guidelines* for those institutions affected by the limitations of the current flexibility offered by the USDE that must, as an alternative, obtain more permanent approval to include the distance education alternative delivery method within the institution's scope of accreditation. The Commission is hopeful that the USDE will extend the flexibility to offer distance education beyond June 1, 2020 but has not yet received such guidance. **The expedited review process will be available only if the USDE extension is not forthcoming.**

To assist institutions with submitting a substantive change request for distance education, the Commission has modified and focused its substantive change application for this purpose and posted it on the Commission's website: <https://www.msche.org/substantive-change>. Institutions will describe their plans for delivering programs and courses via distance education and will provide information on faculty, student, and technology support, among other information. Substantive change requests must be uploaded into the secure MSCHE portal by June 1, 2020. Institutions should review the updated guidance from USDE issued on April 3, 2020, related to licensure and FERPA considerations.

The Commission will take an accreditation action, retroactive to June 1, 2020, to permanently include the alternate delivery method of distance education within the institution's scope of

accreditation in accordance with its *Accreditation Actions Policy and Procedures*. The Commission's action will be published on the institution's Statement of Accreditation Status (SAS). Institutions that submit incomplete or insufficient requests, or those that do not meet the June 1 deadline, will be advised to use the regular substantive change process. Fees will be based on the *Dues and Fees Policy and Procedures*.

Institutions that already hold approval to offer programs by this delivery method **do not** need to do anything more in terms of approval with MSCHE. Consult the institution's Statement of Accreditation Status at the Commission's website, and click the tab *Alternative Delivery Method*, if you are unsure of the institution's status with regard to distance education.

Please continue to access the MSCHE Response to COVID-19 (coronavirus) website for updates and additional resources. A copy of the USDE updated guidance dated April 3, 2020 can be found on the [USDE website](#). As always, chief executive officers and accreditation liaison officers (ALOs) should contact their assigned MSCHE Vice President liaison with questions and concerns. The Commission remains focused on the safety, health, and well-being of our member institutions and all who contribute to peer review.

#### Resources

MSCHE: [www.msche.org/covid-19](http://www.msche.org/covid-19)

U.S. Department of Education: [www.ed.gov/coronavirus](http://www.ed.gov/coronavirus)

U.S. Department of Education, April 3, 2020 UPDATED Guidance:

<https://ifap.ed.gov/electronic-announcements/040320UPDATEDGuidanceInterruptStudyRelCOVID19>

**Download a PDF of this memo at <https://go.msche.org/20200504-expedited-review-for-distance-education>**