

# Pell-Eligible Prison Education Program

Substantive Change Application

Institution:       City, State:

Name of person completing this application:

Title:       Phone:       Email:

Date Submitted:

This completed form will constitute your request for approval of a substantive change. This form will be the basis for review of this application. The questions are designed to elicit brief, succinct, detailed information, rather than a narrative or references to extensive supporting documents. Do not attach other documents unless they are specifically requested in the questions and are germane to the request. Excluding attachments, the completed application form should be no more than 16–20 pages on a single classification of change. The total submission, including attachments, should not exceed 200 pages.  
  
If the person completing this application is not the CEO, CAO or the Accreditation Liaison Officer of the institution, it is understood that the person completing and submitting this application has consulted with and informed those individuals and has been authorized to submit this form on the institution’s behalf.  
  
Please note: HLC plans to update its application forms annually, on or about September 1 of each year. However, if an application form was accessed more than 90 days prior to filing, please visit [hlcommission.org/change](https://www.hlcommission.org/change) to ensure that there have been no changes to the form in the intervening time.  
  
Submit the completed application as a single PDF file at [hlcommission.org/upload](https://www.hlcommission.org/upload). Select “Change Requests” from the list of submission options to ensure the application is sent to the correct HLC staff member.

## Part 1: General Questions

1. **Requested Change(s).** Concisely describe the change for which the institution is seeking approval.
2. **Does another characteristic of the change requested in this application also require prior HLC approval?** (Example: contractual arrangement, new academic program, new additional location, etc.)

No

Yes

If yes, please briefly explain the second type of substantive change requiring prior HLC approval and submit the relevant application form separately (or indicate the date on which it was submitted):

1. **Classification of Change Request.***Note: Not every substantive change requires prior review and approval. Visit* [*hlcommission.org/change*](https://www.hlcommission.org/change) *to make certain that current HLC policy requires the institution to seek approval.*

Pell-eligible prison education program or PEP:

First PEP(s) offered at first correctional facility

First PEP(s) offered at second correctional facility

An institution submitting more than one change request should complete multiple applications, one for each type of change. Change requests may be related to the following topics:

• [New academic programs](https://www.hlcommission.org/Accreditation/substantive-change-academic-programs.html), including degree and certificate programs

• [New Pell-eligible prison education programs](https://www.hlcommission.org/Accreditation/substantive-change-pell-eligible-prison-education-programs.html) (also referred to as PEPs)

• [Changes to existing academic programs](https://www.hlcommission.org/Accreditation/substantive-change-clock-credit-hours-program-content-and-length-of-term.html) involving credit/clock hours, method of delivery

or length of term

• Opening or closing [additional locations or branch campuses](https://www.hlcommission.org/Accreditation/substantive-change-off-campus-activities.html)

• [Provisional Plans](https://www.hlcommission.org/Accreditation/provisional-plans-and-teach-outs.html) (with or without Teach-Out Agreements, as applicable)

• [Teach-Out Agreement](https://www.hlcommission.org/Accreditation/provisional-plans-and-teach-outs.html) if closing a campus or additional location that provides 100% of at least   
 one program

• Access to HLC’s [Notification Program for Additional Locations](https://www.hlcommission.org/Accreditation/substantive-change-off-campus-activities.html)

• Initiating or expanding [distance education offerings](https://www.hlcommission.org/Accreditation/substantive-change-distance-or-correspondence-education.html)

• Initiating or expanding [correspondence education offerings](https://www.hlcommission.org/Accreditation/substantive-change-distance-or-correspondence-education.html)

• Offering programs through [competency-based education](https://www.hlcommission.org/Accreditation/substantive-change-competency-based-education.html) (credit-based, direct assessment

or hybrid)

• Initiating or modifying [contractual arrangements](https://www.hlcommission.org/Accreditation/substantive-change-contractual-arrangements.html)

• Change in [mission](https://www.hlcommission.org/Accreditation/substantive-change-mission-or-student-body.html)

• Change in [student body](https://www.hlcommission.org/Accreditation/substantive-change-mission-or-student-body.html)

1. **Special conditions.** Indicate whether any of the conditions identified below fit the institution (Yes or No). If Yes, explain the situation in the space provided.
2. Is the institution, in its relations with other institutional or specialized accrediting agencies, currently under or recommended for a negative status or action (e.g., withdrawal, probation, sanction, warning, show-cause, etc.)?
3. Is the institution now undergoing or facing substantial monitoring, special review, or financial restrictions from the U.S. Department of Education or other federal or state government agencies?
4. Has the institution’s senior leadership or board membership experienced substantial resignations or removals in the past year?
5. Is the institution experiencing other pressures that might affect its ability to implement the proposal (e.g., a collective bargaining dispute or a significant lawsuit)?
6. **Internal Approvals.** Attach documentation of internal (faculty, board) approvals that the institution has obtained for the proposed change. **All required approvals must be obtained before submitting the application to HLC.** If no approval is required, attach evidence that approval is not needed (e.g., applicable regulation, statute or correspondence).
7. **State Approvals.** Attach documentation of state approvals that the institution has obtained for the proposed change. **All required approvals must be obtained before submitting the application to HLC.** If no approval is required, attach evidence that approval is not needed (e.g., applicable regulation, statute or correspondence).
8. **System Approvals.** If applicable, attach documentation of system approval that the institution has obtained for the proposed change. **All required approvals must be obtained before submitting the application to HLC.** If no approval is required, attach evidence that approval is not needed (e.g., applicable regulation, statute or correspondence). Check the box below if the institution is not part of a system.

Not Applicable

1. **Foreign Country Approval(s).** If applicable, attach documentation of foreign country approval(s) that the institution has obtained for the proposed change. Documentation must be written in or translated to English. **All required approvals must be obtained before submitting the application to HLC.** If no approval is required, attach evidence that approval is not needed. Check the box below if the proposed change is not related to offerings in a foreign country.

Not Applicable

1. **Specialized Accreditation.** Complete this section only if specialized accreditation is required for licensure or practice in program(s) covered by this change application.

The institution has already obtained the appropriate specialized accreditation. Attach a copy of the letter from the agency granting accreditation.

The institution has begun the process of seeking or plans to seek specialized accreditation. Specify the name of the agency and the timeline for completing the process in the space below. (If approval is a multi-stage process, the institution should contact the HLC staff liaison to discuss the timeline before submitting this change application form.)

The institution does not plan to seek specialized accreditation. Provide a rationale for not seeking this accreditation in the space below.

1. **Changes Requiring Visits.** This section is not for HLC-mandated visits such as additional location confirmation visits or campus evaluation visits.

Complete this section only if the institution is already aware that the proposed change will need to be reviewed through a visit. The institution may submit Part 1 of the change request application to begin the process of scheduling a Change Visit or adding the proposed change to an already scheduled visit. The full application must be submitted at a later date. (If the institution is unsure whether a visit is required, leave this section blank and submit the full change application. HLC will advise the institution based on the information provided.)

1. Select the type of visit the institution is requesting:

Request to schedule a Change Visit.

Change Visits typically are scheduled approximately four months from the date an institution submits its change request. The full change application and other required materials will be due to HLC and the peer review team eight weeks before the visit date. See [Change Visit: Required Materials and Submission Procedures](https://www.hlcommission.org/change-visit) for more information.

Request to embed a Change Visit into an already scheduled visit.

**Note:** Such requests must be submitted at least six months before the visit date. HLC staff will determine whether to embed a Change Visit based on peer reviewer availability and the complexity of the scheduled visit, among other factors. HLC may not be able to accommodate all requests.

Specify type of visit and date scheduled:

The institution’s full change application should be submitted along with other materials required for the already scheduled visit.

1. Provide URLs to the institution’s faculty/staff handbook and catalog below. If the URLs are not available, please provide PDF versions of these documents when submitting other required materials prior to the visit.

Faculty/Staff Handbook URL:

Catalog URL:

## Part 2: Topic-Specific Questions

Instructions

Multiple Pell-eligible prison education programs and one new additional location (or a previously approved additional location) may be requested in a single application.

Pell-Eligible Prison Education Program Requirements

If Pell funding is intended to support any portion of the program(s) in question, HLC holds the institution accountable for meeting all the requirements associated with Pell-eligible prison education programs (also referred to as PEPs).

In addition, HLC expects that students will have the **opportunity to complete 100% of a recognized educational program** through such programs or through substantially similar programs made available through transfer arrangements (either at the time of transfer to another correctional facility [if the student is still incarcerated] or to an institution of higher education [if the student is released]).

### Section A: Eligibility to Offer a Pell-Eligible Prison Education Program

1. Within the specific context of PEPs, certain conditions would render an institution ineligible to complete this application. **Please affirm that none of the following conditions apply to your institution:**

* During the last five years preceding this application, the institution has been subject to any of the following circumstances in accordance with 34 CFR 668.236:
  + A suspension, emergency action or termination of programs by the U.S. Department of Education under Title IV of the Higher Education Act (as amended).
  + A final accrediting action that is an adverse action, if taken by HLC or by any programmatic accreditor with oversight over any program contemplated by this application.
  + An action by the State to revoke a license or other authority to operate.
* As of the date of this application, an [adverse action](https://www.hlcommission.org/Accreditation/sanctions-show-cause-orders-and-adverse-actions.html) has been initiated against the institution (even if such adverse action remains subject to appeal) by HLC or any programmatic accreditor with oversight over any program contemplated by this application.

The institution has not been subject to any of the conditions described above that would render it ineligible to complete this application.

1. Attach the institution’s application and evidence of approval from the relevant oversight entity for the correctional facility.

### Section B. Summary of the Change Requested

1. Indicate the type of correctional facility at which the proposed PEP will be offered and provide the information requested in the questions below.
   1. Type of correctional facility. For example, federal, state or local prison, jail, penitentiary, juvenile justice facility, reformatory, work farm or other.
   2. Name and street address of correctional facility. Do not provide a PO Box. Include the date of HLC approval for this address in parenthesis if it is already approved.
   3. Name of oversight entity for correctional facility, including contact person’s name, title, email address and phone number.
   4. Identify the basic characteristics of each proposed PEP, including the full name of the proposed program (i.e., the specific certificate, degree or other recognized credential), instructional level (if not a degree program), and the 6-digit CIP Code (XX.XXXX) of the program.   
        
      **Note:** If more than one program is proposed, indicate with an asterisk which program the institution considers the “first” program at this location. If the application is approved, this designation is important for the purposes of the follow-up additional location confirmation visit for PEPs.
   5. Indicate whether the educational program(s) is/are approved by HLC:

Yes

No

If no, complete HLC’s screening form for [new degree programs](https://www.hlcommission.org/Accreditation/new-degree-program-screening-form.html) or [new certificate programs](https://www.hlcommission.org/Accreditation/certificate-program-screening-form.html). If applicable, submit an application for approval of the program with this application.

* 1. What modality of instruction will be used (e.g., distance education, face-to-face, etc.)?

Is additional HLC approval needed for the institution to offer this program in the intended modality? See the institution’s [Institutional Status and Requirements Report](https://www.hlcommission.org/Accreditation/download-the-isr-report-canopy-user-guide.html) for its current HLC stipulations related to modalities.

No

Yes

**If yes,** submit the appropriate substantive change application with this application.

* 1. Planned start date for the PEP. (Note: The institution may not initiate the program until it receives written HLC approval.)

1. Provide the total number of credit hours (or clock hours, as applicable) required for completion of the program. Also indicate whether a semester or quarter calendar will be followed at the correctional facility.
2. What is the typical length of time the institution expects for this population of students to complete the educational program offered? Describe how the institution intends to coordinate with the oversight entity and/or the correctional facility to enhance completion rates among students who are incarcerated.
3. Does the student population anticipated at the proposed location represent a change from the mix of students now enrolled at the institution?

No

Yes

**If yes,** briefly explain (1) the institution’s experience with the targeted student population, (2) what resources the institution has in place to serve that population, and (3) how it anticipates delivering those resources.

1. What change, if any, will be made in the mission statement and mission-related documents of the institution (vision, goals and purposes)? If no changes are anticipated, please elaborate.
2. What change, if any, will occur in the number, demographics and composition of the staffing and in the structure of the administrative organization at the institution in order to serve its PEP students?
3. Did the institution previously participate in a Second Chance Pell Experimental Sites Initiative or is it currently participating in the Revised Second Chance Pell Experimental Sites Initiative?

No

Yes

**If yes,** attach to this application evidence of the institution’s self-evaluation of its efficacy in delivering educational programs and in contributing to student success.

### Section C. Institution’s History With Correctional Facilities

*Do not complete this section if the institution participated in a Second Chance Pell Experimental Sites Initiative.*

1. Does the institution currently offer instruction at two or more correctional facilities with the same or greater scope/level of instruction as the proposed location and with the same or greater level of sophistication in facilities and services?

No

Yes

**If yes,** identify the two such locations with the largest enrollments during the past year, along with those enrollment numbers.

Location 1 (include address):

Enrollment:

Location 2 (include address):

Enrollment:

1. If approved to offer a PEP at the correctional facility identified, what future trends does the institution anticipate (e.g., in the next one to three years) for its programming at the facility? How does the institution plan to manage these trends? (This response may require collaboration with the oversight entity and correctional facility).
2. Is the correctional facility where the proposed PEP(s) will be offered an active additional location approved by HLC?

No

Yes

**If no, complete questions 12a–c.**

12a. What impact might the proposed additional location have on any challenge(s) identified as part of or subsequent to the institution’s last HLC comprehensive evaluation and how has the institution addressed the challenge(s)?

12b. Briefly describe the planning process for the location, including the involvement of the various constituencies in that process. Describe the oversight of instruction and student support services for the location and how that oversight fits into the organizational structure of the main campus.

12c. For the proposed location, provide a description of physical facilities, technology and equipment to support the programs that will be offered at the location.

### Section D. Institutional Planning for PEPs

1. What impact might the proposed change in student body have on challenges identified as part of or subsequent to the last HLC review and how has the institution addressed the challenge(s)?
2. What is the evidence that offering the program at the location will meet the needs of the students to be served and the curriculum to be delivered?
3. What controls are in place to ensure that the information in advertising, brochures or other communications presented to all constituencies (especially, students) will be accurate?
4. What additional support, from the institution’s perspective, may be required to confront challenges to the sustainability of the proposed program? How does the institution intend to address these challenges? Describe the institution’s contingency plans if, in the future, it no longer wishes to participate in offering PEPs at the correctional facilities identified in this application. What factors, if any, might contribute to a decision to discontinue such programs?
5. How does the institution ensure that financial planning and budgeting for the PEP are realistic What are the projected revenues and expenses? What are the projected enrollment and staffing needs?

### Section E. PEP Curriculum and Instructional Design

1. How will the institution effectively oversee instruction at the correctional facility identified in this application?
2. What impact, if any, will the planned instruction at the correctional facility have on overall instructional capacity at the institution’s main campus and other locations?
3. Does the institution anticipate accelerated delivery, wherein the earning of semester credit hours or equivalent routinely exceeds 20 credits in 4 months or 60 credits in 12 months)?

No

Yes

**If yes,** please explain the extent to which such options will be available and what process and/or criteria the institution will use to determine student eligibility to participate in such accelerated programs.

1. Describe the institution’s process for determining which modality (or modalities) of instruction are best suited for the PEP described in this application. For each modality to be used, describe how the institution will monitor the effectiveness of the modality in enhancing the learning experience of the student population and optimizing the curriculum design previously described.

### Section F. Professional Licensure, Certifications, Employment and State Parameters

***Note****:* An institution’s ability to offer programs designed to lead to licensure, certification or certain occupations may be constrained depending on various parameters related to the student as a potential employee, given their status as a formerly incarcerated individual.

1. Is the program of instruction constituting the PEP intended to prepare students to sit for licensure or certification examinations needed to practice or obtain employment?

No

Yes

**If yes, complete questions 22a and 22b.**

22a. Attach documentation that the program provides all required course resources and otherwise satisfies all applicable educational requirements to enable the student to secure such professional licensure or certification, including any requirements to sit for licensure or certification examinations needed to practice or obtain employment in the sectors or occupations for which the program prepares the individual.  
  
i. In the case of a program offered at a state correctional facility, evidence must be provided that the program satisfies the requirements for licensure in the state where the correctional facility is located.  
  
ii. In the case of a federal correctional facility, evidence must be provided that the program satisfies the requirements for licensure in the state where most of the students confined or incarcerated in such facility will reside upon release, as determined by the institution on at least an annual basis based on information provided by the oversight entity. (34 CFR 668.236(a)(7)).

22b. Institutions are responsible for complying with [34 CFR 668.236(a)(8)](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-VI/part-668/subpart-P/section-668.236). Describe limitations imposed by the state and how the institution is ensuring its compliance with such limitations. If none, state “Not applicable.”

### Section G. Institutional Staffing, Faculty, and Student Support

1. How does the institution plan to ensure appropriate staffing for the correctional facility in the areas of academic instruction, resources for teaching and learning, and student support and services?
2. In what ways does this differ from the institution’s processes for staffing at the main campus? Describe what role, if any, correctional facility staff, representatives of its oversight entity or other parties have in the process.
3. What is the institution’s process for selecting, training and orienting faculty for the correctional facility? What special professional development, support or released time (if applicable) does the institution envision providing for these faculty?
4. What is the evidence that the institution will effectively deliver, support and manage necessary academic and student support services at the proposed additional location, taking into account the needs of the anticipated student population?

### Section H. Evaluation

1. Describe the process for monitoring, evaluating and improving the overall effectiveness and quality of the PEP.
2. Describe the process for assessing and improving student learning, including student persistence and completion, in the PEP.
3. How are the measures and techniques the institution uses for assessment and evaluation at the correctional facility referenced in this application equivalent to those for assessment and evaluation at the main campus or other additional locations? If there are differences, why are these differences appropriate?
4. Describe the institution’s process for continuously ensuring that the PEP meets the same standards as substantially similar programs.