

ACCREDITATION

Overview

Accreditation is a process of external review used by the higher education community to assure quality & promote ongoing improvement. Accreditors are private, non-profit organizations whose members are colleges & universities.

The primary functions of accreditation agencies include the following.

- Assess the quality of academic programs at institutions of higher education.
- Create a culture of continuous improvement at colleges & universities & stimulate a general raising of standards among universities.
- Involve faculty & staff extensively in university evaluation & planning.

Accreditation relies on a rigorous peer-review process to define & evaluate whether universities meet high standards. While each accreditor establishes standards, the standards must meet basic federal requirements to ensure consistency across accrediting agencies. Accreditors regularly assess member institutions to ensure the institutions continue to meet the standards.

As part of information gathering for this document, Board staff completed the following.

- Review of accreditor websites, bylaws, & accreditation standards
- Regular meetings with accreditation liaisons from all 12 State University System universities
- Meetings with accreditor representatives
- Meetings with Florida College System representatives

This document provides information on the following topics across six identified accreditors.

Background

Governance

Standards

Process

Costs

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Executive Summary

Recommendations & Findings

Board of Governors Staff has identified the following additional accreditors as suitable for the State University System of Florida



Quality & Governance	<ul style="list-style-type: none">Each accreditor states it prioritizes academic quality & inclusive governance
Standards	<ul style="list-style-type: none">Standards are generally comparable across all accreditors with nuanced differencesA comprehensive review of each accreditor’s standards is needed by individual universities
Accreditation Processes	<ul style="list-style-type: none">Four accreditors have developed streamlined processes for reviewing currently accredited universities in good standing, & the fifth (MSCHE) is in the process of developing a process
Costs	<ul style="list-style-type: none">The majority of costs universities incur are expenses required to maintain accreditationUniversity expenses will temporarily increase during the transition to a new accreditor
Accrediting Agency Membership	<ul style="list-style-type: none">HLC (995) & MSCHE (519) have the largest number of member institutionsThe membership of each accreditor includes universities in the Top 100 public universities ranked by U.S. News & World ReportFour of the accreditors accredit members of the Association of American Universities (AAU)
Additional Considerations	<ul style="list-style-type: none">Each accreditor will differ in its ability & willingness to accommodate new membersEach accreditor's governing board determines the extent to which the accreditor can expand membershipAccreditation liaisons from the State University System's 12 universities have noted there is a beneficial synergy to having all universities accredited by the same accreditor

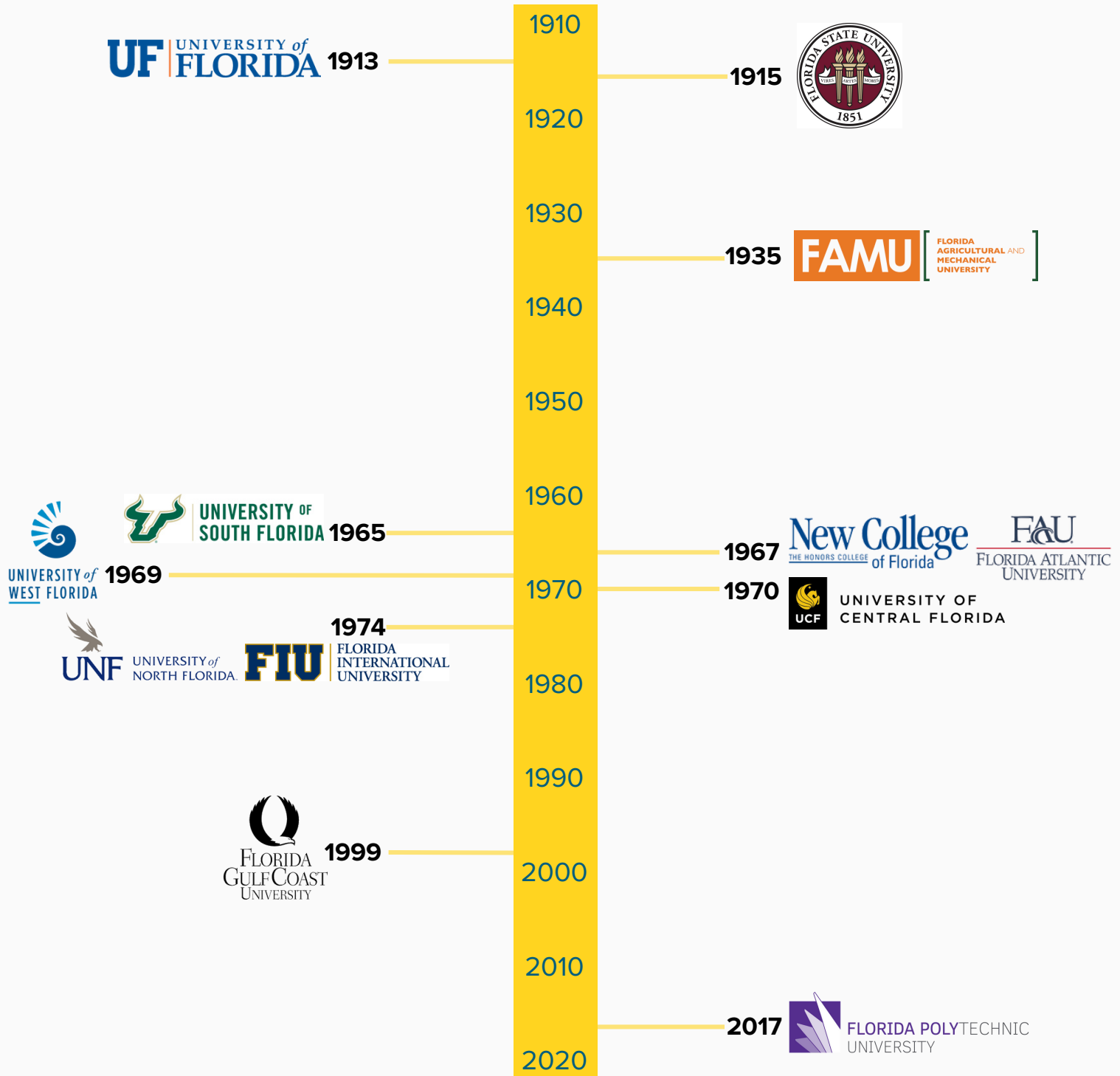
The leadership of each state university will need to review these factors in light of missions, goals, & priorities to determine which accreditor would be the best fit.

State University System of Florida

Initial Accreditation

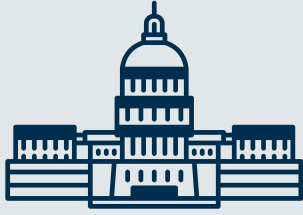


- Florida public universities are accredited by the Southern Association of Colleges & Schools Commission on Colleges (SACSCOC), established in 1895
- This accreditation status allows course credits from Florida public universities to transfer to other accredited universities, enables distribution of federal student aid funds to students, & permits access to federal grant funds



Federal Requirements

Recognition of Accrediting Agencies



- **Accreditors recognized by the U.S. Department of Education (USDOE) must follow certain criteria**
 - Ensure its ability to provide a quality education
 - Help facilitate the smooth transfer of credits among colleges & universities
 - Promote confidence to private sector employers who hire its graduates
- **Universities accredited by recognized agencies may distribute federal student aid & are eligible for federal grants**

Requirements for Accreditor Standards

Accreditors must consider the following information when developing accreditation standards

- Student achievement
- Curricula
- Faculty
- Facilities, equipment, & supplies
- Fiscal & administrative capacity
- Student support services
- Recruiting & admissions practices
- Academic calendars, catalogs, publications, grading, & advertising
- Student complaints
- Program length*
- Degree or credential objectives*
- Compliance with program responsibilities under Title IV of the Higher Education Act**
- Preaccreditation standards
 - Related to the accreditation standards
 - Five-year limit on preaccreditation status

Requirements for Accreditor Monitoring & Reevaluation of Member Institutions

Accreditors must monitor & reevaluate institutions, collect reports, & track institutional growth

- Reevaluate institutions regularly
- Monitor & evaluate to identify issues
- Collect periodic reports & key indicators of performance
 - Fiscal
 - Student achievement
 - Additional reports
- Monitor institutional growth
- Collect annual head-count enrollment data
- Monitor program growth at institutions experiencing significant enrollment growth

Requirements for Accreditor Internal Review of Standards

Accreditors must internally review accreditation standards

- Comprehensive
- Occur at regular intervals or on an ongoing basis
- Examine standards separately & as a whole
- Involve all constituencies
- Allow meaningful input from constituents
- Before finalizing changes:
 - Provide notice to relevant constituencies
 - Allow constituencies to comment
 - Review & respond to any comments

*This does not apply if none of the institutions the agency accredits participate in any Title IV Higher Education Act programs or if the agency only accredits programs within institutions accredited by a recognized institutional accrediting agency.

**This does not apply if the institution does not participate in any Title IV Higher Education Act programs.

Accreditor Types

National & Regional Accreditors



- The USDOE currently recognizes both regional & national accrediting agencies as "institutional" accreditors
- Regional accreditors accredit institutions comparable to those in the State University System of Florida

Formerly Regional Accreditors

Formerly National Accreditors

Scope

Majority are public & non-profit private

Majority are for-profit

Member Institutions

Focus on comprehensive degree-granting institutions including all AAU & US News & World Report Top 100 public institutions

Focus on trade & vocational schools, career programs, faith-based institutions, & online colleges

Credit Transfers

Credits widely accepted

Credits not widely accepted

of Accreditors Recognized by the USDOE

6

20

Accrediting Agencies Recognized by the USDOE

SIX REGIONAL ACCREDITORS

- Higher Learning Commission (HLC)
- Middle States Commission on Higher Education (MSCHE)
- New England Commission of Higher Education (NECHE)
- Northwest Commission on Colleges & Universities (NWCCU)
- Southern Association of Colleges & Schools Commission on Colleges (SACSCOC)
- WASC Senior Colleges & Universities Commission (WSCUC)

EXAMPLES OF NATIONAL ACCREDITORS

- Accrediting Commission of Career Schools & Colleges
- Accrediting Council for Continuing Education & Training
- Council on Occupational Education
- Association for Biblical Higher Education, Commission on Accreditation
- Association of Institutions of Jewish Studies
- National Association of Schools of Dance, Commission on Accreditation
- National Association of Schools of Music, Commission on Accreditation
- Distance Education Accrediting Commission



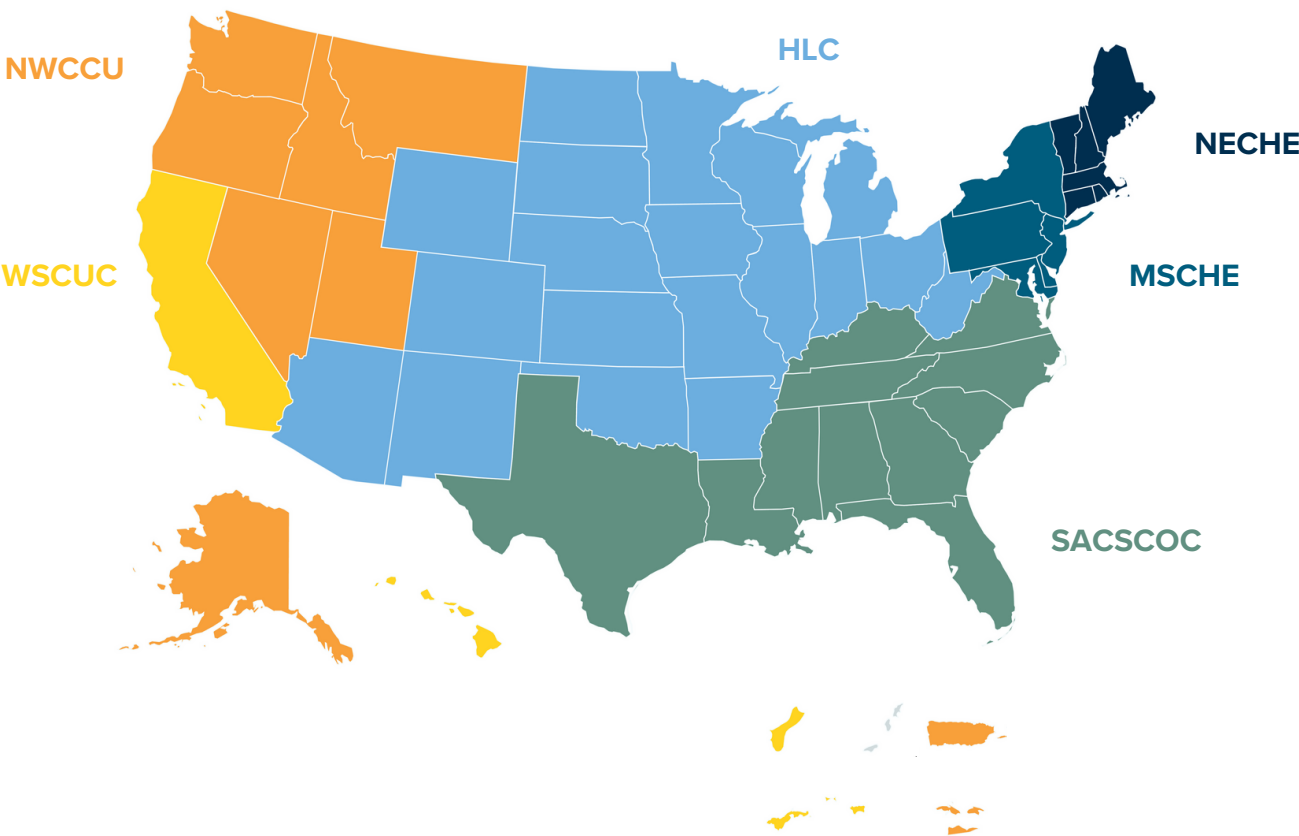
Accrediting Agency Types

Regional Accrediting Agencies



- Regional accreditors historically served specific regions of the country
- As of July 2020, accreditors are allowed to accredit institutions outside traditional regional boundaries
- All regional accreditors require a reaffirmation review every 6-10 years

Traditional Regional Accreditor Boundaries (Pre-2020)



Accreditor Processes	SACSCOC	HLC	MSCHE	NECHE	NWCCU	WSCUC
Mid-Point Review	5th Year	4th Year*	No mid-point review	5th Year	3rd Year	No mid-point review
Accreditation Cycle	10 Years	10 Years	8 Years	10 Years	7 Years	6, 8, or 10 Years**

*HLC offers two pathways to accreditation: Standard Pathway & Open Pathway. The Standard Pathway includes a comprehensive evaluation in year 4. The Open Pathway includes an assurance review in year 4 & a quality initiative in years 5-9.

**WSCUC noted that most institutions initially accredited will be put on a 6 year cycle; however, the cycle may vary based on the readiness of the institution.

Source: Map from the Council of Higher Education Accreditation

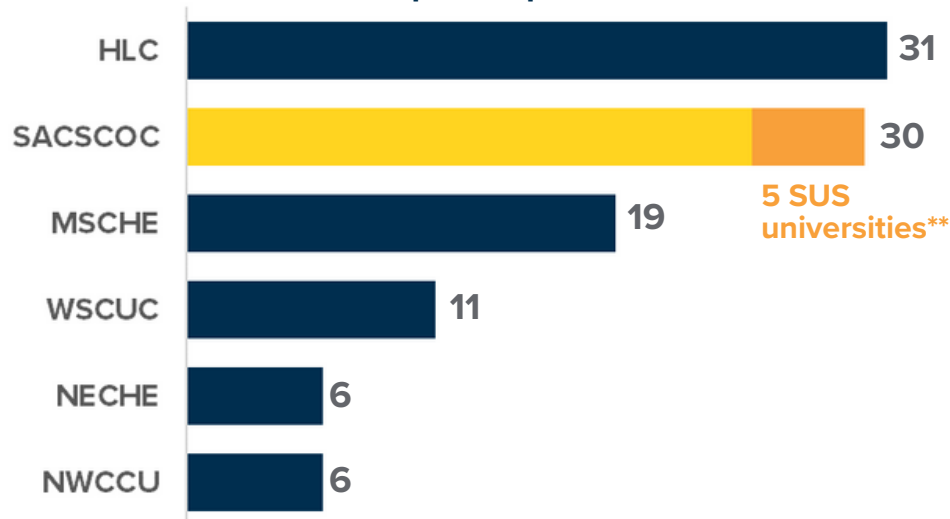
Background

Member Institutions of Regional Accreditors

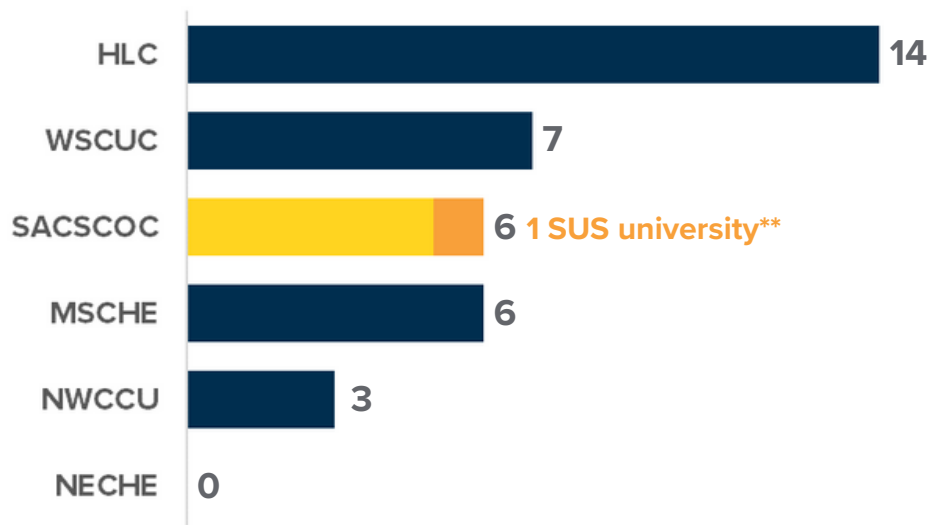


- All public universities on the U.S. News & World Report Top 100 Public Universities list are accredited by regional accreditors
- All public universities within the Association of American Universities (AAU) are accredited by regional accreditors

Number of Member Universities in the
U.S. News & World Report Top 100 Public Universities*



Number of Public Member Universities in the AAU



**The SUS universities in the U.S. News & World Report Top 100 Public Universities list are University of Florida (5th), Florida State University (19th), University of South Florida (46th), University of Central Florida (67th), & Florida International University (78th). The only SUS university in the AAU is University of Florida.

*Total adds to 103 institutions because of ties in the rankings.

Background

Member Institutions by Type



- SACSCOC & HLC have the largest number of member institutions
- HLC has the most similar institutional makeup compared to SACSCOC
- NWCCU has the highest proportion of public institution membership

Institution
Type



Public



Private,
Not-for-Profit



Private,
For-Profit



Other

SACSCOC

Total: 779



HLC

Total: 995



MSCHE

Total: 519



NECHE

Total: 235



WSCUC

Total: 228



NWCCU

Total: 163



Note: Each building represents 100 member institutions.

Governance

Board Composition

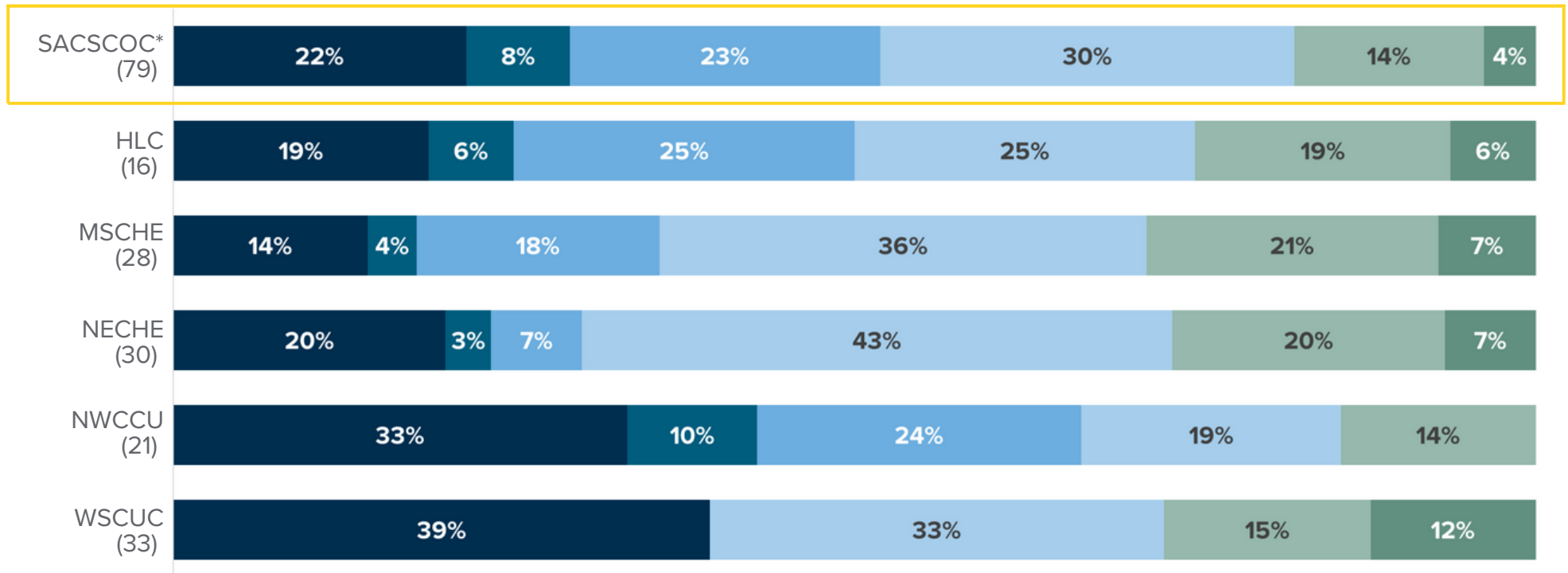


Federal Requirements for Board Membership Accreditors

- Academic & administrative personnel
- Public representatives

Public University Representation

- WSCUC & NWCCU have the highest percentage of board representatives from public universities



*Information obtained from the SACSCOC website. According to SACSCOC Standing Rules, the board must consist of 33 individuals connected with institutions offering undergraduate & graduate programs or only graduate programs (2 from each state), 22 individuals connected with institutions offering only undergraduate programs (1 from each state), 10 academics connected or employed by a member institution in the geographical territory of SACSCOC, 1 individual representing international member institutions, & 11 individuals representing the public.



SACSCOC Delegations

- Each of the 11 states accredited by SACSCOC has a delegation of representatives on the board
- One SUS representative is a member of the Florida delegation

SACSCOC Florida Delegation



Representative	Count	Institution
Public Universities	1	University of Central Florida
Public Colleges	3	Gateway College North Florida College Northwest Florida State College
Private Institutions	2	St. Thomas University Webber International University*
Public Members	1	Florida State Senator Anitere Flores

*Chair of state delegation

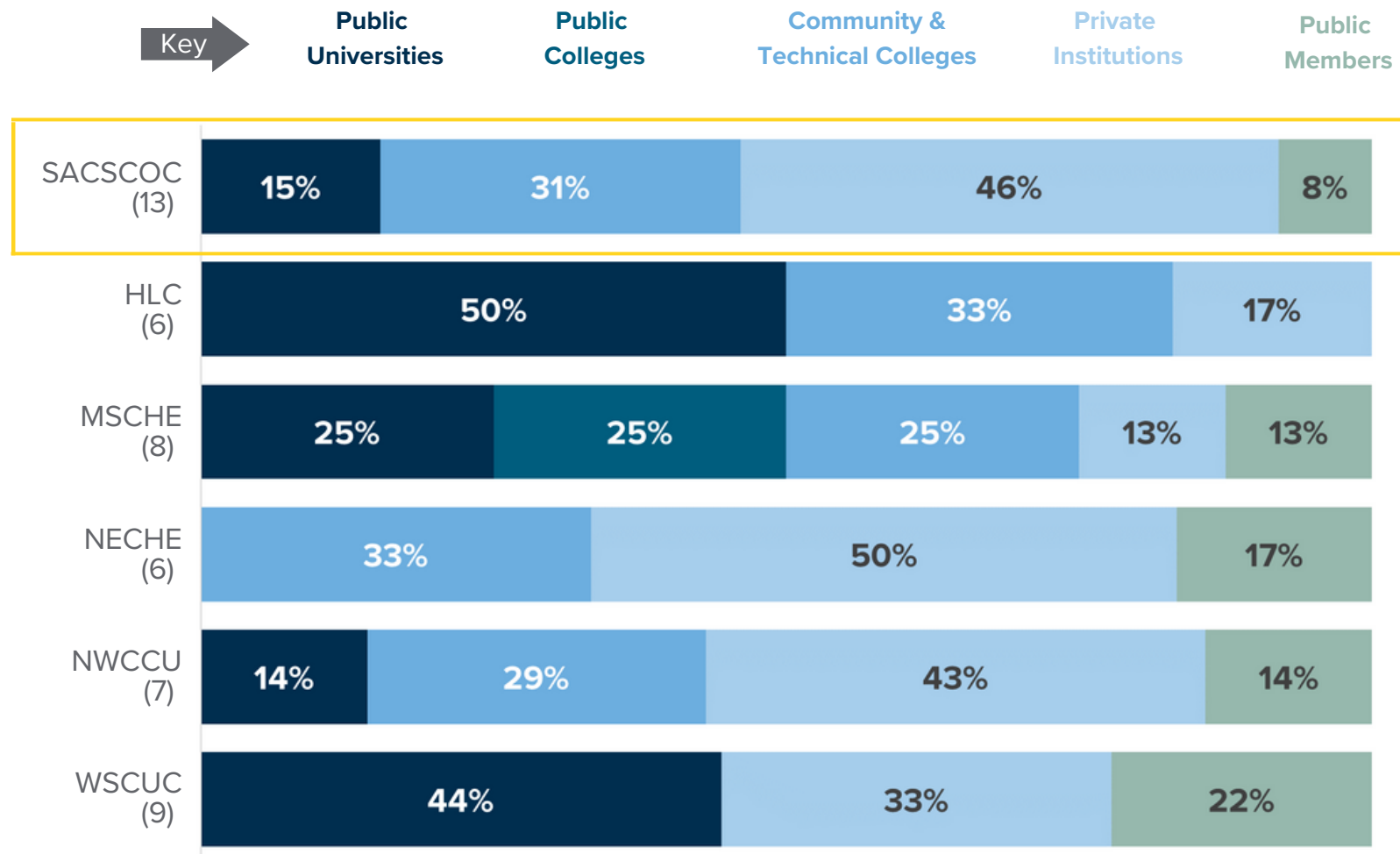
Governance

Executive Councils



Executive Councils of Accreditors

- Executive councils are a subset of board members that act on behalf of the board between meetings



Governance

President Selection & Powers*



Leadership Selection

- The president is selected & evaluated by either a board or the executive committee

Presidential Processes	SACSCOC	HLC	MSCHE	NECHE	NWCCU	WSCUC
Selection Body	Executive Council	Board of Trustees	Executive Committee	Executive Committee	Board of Commissioners	Nominated by Executive Committee, chosen by the Board of Commissioners
Annual Evaluation Conducted by	Executive Council	Board of Trustees	Executive Committee	Executive Committee	Board Chair	Executive Committee
Presidential Termination Authority	Unknown	Board of Trustees	Executive Committee	Executive Committee	Board of Commissioners	Unknown
Presidential Powers	<ul style="list-style-type: none"> Supervise & direct management & operation of the corporation Make all policy decisions between board meetings Supervise employees between board meetings 	<ul style="list-style-type: none"> Manage activities Employ & terminate staff Provide leadership Execute documents on behalf of the board that are consistent with board direction 	<ul style="list-style-type: none"> Day-to-day managerial responsibility Employ & terminate staff Execute & acknowledge contracts & other instruments on behalf of the commission 	<ul style="list-style-type: none"> Employ & terminate staff Execute contracts or other instruments authorized by the Commission Perform other duties, as necessary 	<ul style="list-style-type: none"> Employ & terminate staff Manage activities Provide leadership Execute documents on behalf of the board 	<ul style="list-style-type: none"> Supervise, direct, & control affairs, property, & staff General powers, duties, & authorities vested in the chief executive office Manage operations consistent with financial plan or operating budget from board

*President & chief executive officer are used interchangeably.

Accreditation Standards

Key Findings

Accreditation standards for all accreditors must comply with USDOE requirements

- Standards from all six regional accreditors were reviewed
- Standards among accreditors are generally comparable
- All accreditors are focused on quality & student success; however, distinctive approaches for the review & approval of compliance may be employed by each accreditor

Review of Accreditor Standards



1. Accreditation emphasizes quality & student success

The goal of accreditation is to ensure that the education provided by institutions of higher education meets levels of quality that ultimately leads to student success. Accreditation ensures that universities are focused on providing a quality education to their students. Universities distinguish themselves by going above & beyond the accreditation standards to achieve a higher level of quality.



2. Standards are generally comparable across all accreditors with nuanced differences

All accreditors have standards relative to the following: integrity; mission; eligibility; governance; administration & organization; faculty; planning & effectiveness; student achievement; academic programs; academic & student support services; financial & physical resources; library & learning/information resources; transparency & university representation; & educational policies, procedures, & practices. However, there are some differences between each accreditor's definitions & approaches to evaluating standards which could impact university policies & processes. Universities may be challenged upholding current standards while meeting the standards of the new accreditor.



3. An in-depth collaborative review with accrediting agency staff is required

This preliminary review of standards was focused on the suitability of each accreditor for State University System universities. As each university prepares to change its accreditor, an in-depth review of each accreditor's standards & policies will need to occur. This in-depth review will be an extensive process, including ongoing consultation with the chosen accreditor & accreditation consultants.

Accreditation Process

Steps Required



Changing accreditors is a multi-step process

- State University System universities has been bound to SACSCOC since 1913
- Rules regarding institutional change of accreditors can be found in Title 34 Code of Federal Regulations, 600.11
- The Federal rule change in 2020 allows institutions to switch accreditors & increases national competitiveness among accreditors
- This change allows universities to choose an accreditor based on quality & fit

Prior to applying to a new accreditor, each university must receive approval from the USDOE

1

- University provides the following to the USDOE
 - Accreditation & preaccreditation materials
 - Reasonable cause
- University receives approval from the USDOE

2

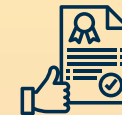
- University applies for membership with the different accreditor while maintaining SACSCOC accreditation

3

- University receives membership from different accreditor & notifies the USDOE

4

- University must maintain SACSCOC accreditation until the USDOE provides written acknowledgment of accreditation change



Voluntary Membership

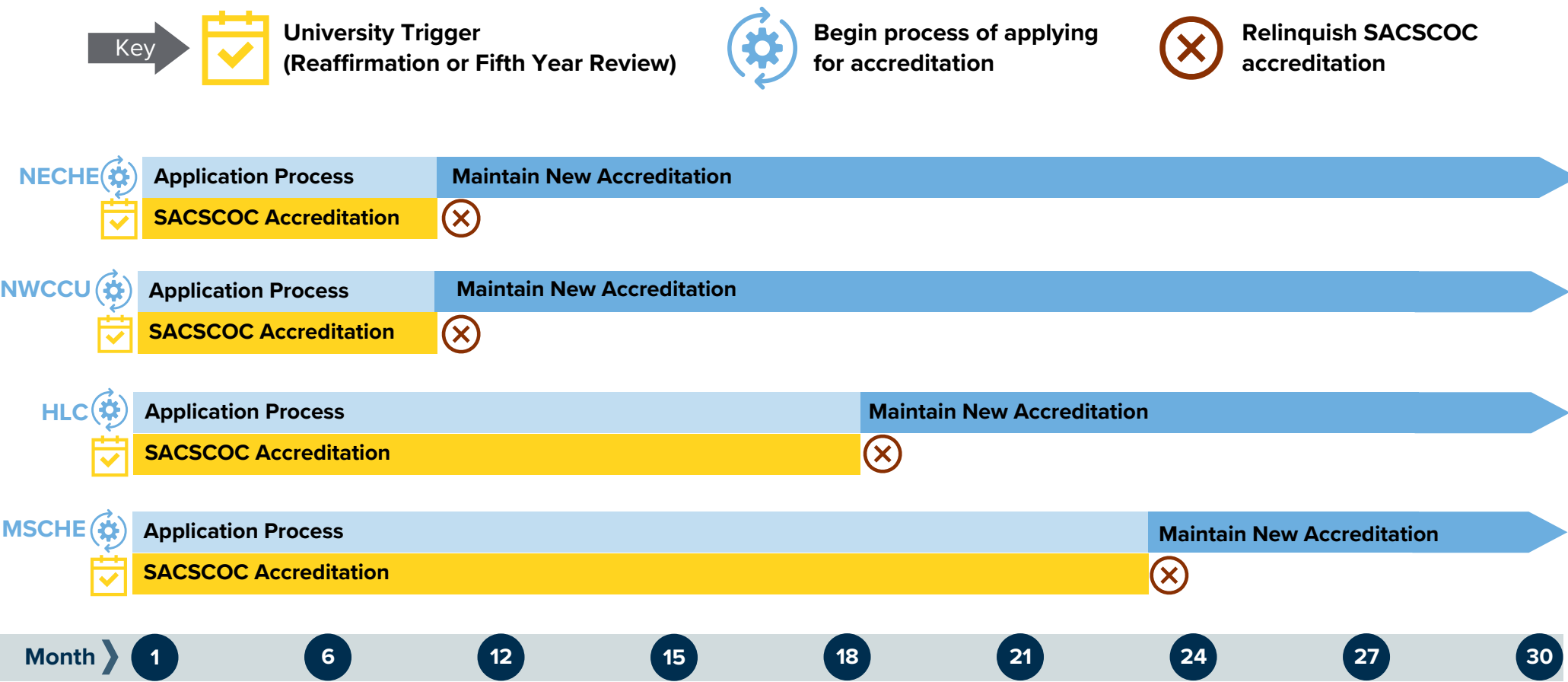
Per Code of Federal Regulations Title 34 Part 602.14, the Secretary will only recognize an accrediting agency with voluntary membership of higher education institutions



Accreditation Process

Initial Application Timeline

Universities must maintain accreditation with SACSCOC until granted accreditation with a different accreditor	HLC	MSCHE	NECHE	NWCCU	WSCUC
	Transition Timeframe*	Within 18 months	23-30 Months	8 Months	A few months-years



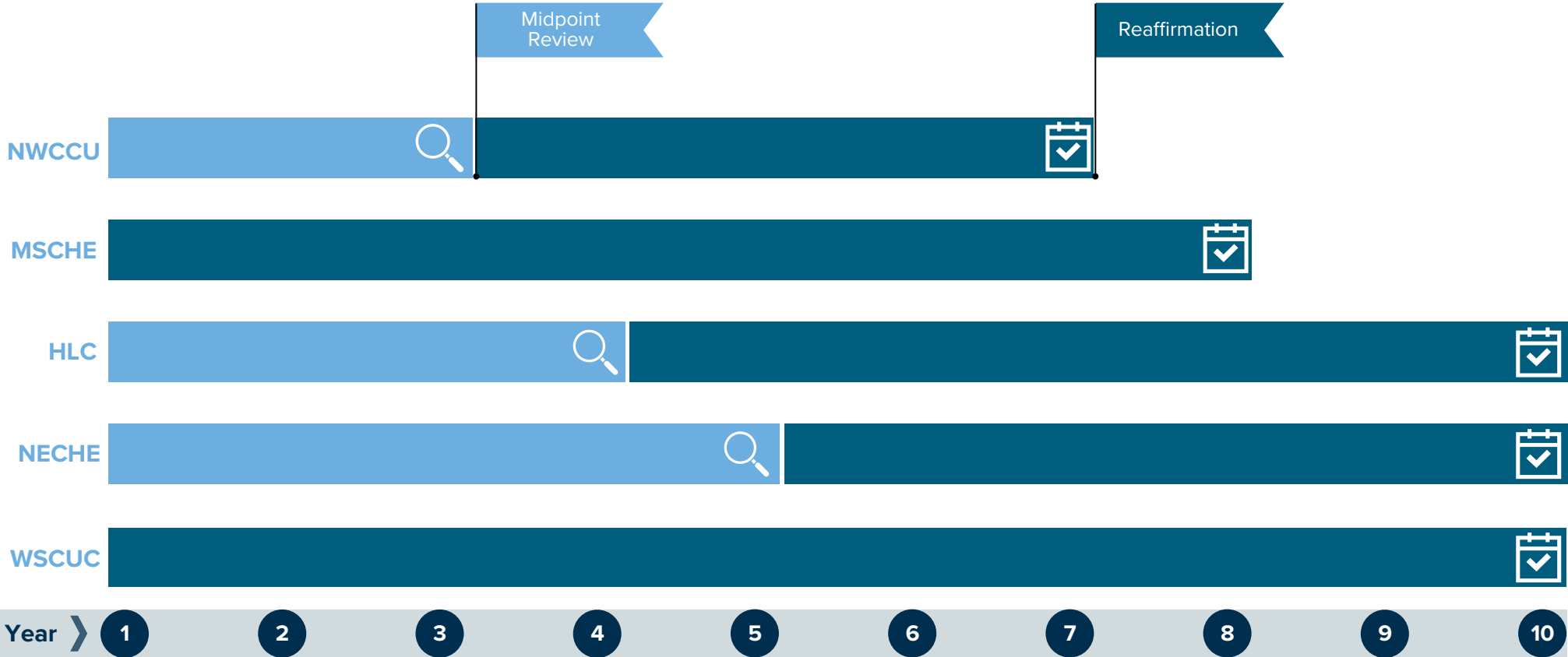
*All agencies indicated that the duration of the application process is institution specific. For WSCUC, we assume a 1.5-year application process. For NWCCU we assume a 1-year application process.

Accreditation Process

Midpoint Review & Reaffirmation Timeline

Accreditation is fundamentally iterative, timelines are approximated

	HLC	MSCHE	NECHE	NWCCU	WSCUC
Midpoint review	Year 4	Not applicable*	Year 5	Year 3	Not applicable**
Reaffirmation	Year 10	Year 8	Year 10	Year 7	Year 6, 8 or 10***



*MSCHE includes an interim report on its website, but suggested we exclude this report from our estimates as it is under review. Member institutions must undergo a self-study as part of reaffirmation. Therefore, this review is included in the cost estimates, but not the timeline overview.

**No standard interim report is required by WSCUC; however 90% of member institutions undergo some type of interim review at various points of time determined on a case-by-case basis.

***WSCUC noted that most institutions initially accredited will be put on a 6 year cycle; however, the cycle may vary based on the readiness of the institution.

Accreditation Process

Mid-point Reviews

Most accreditors include a mid-point review halfway through the course of the accreditation cycle

Reviews may include



A report



A visit



Both

	SACSCOC	HLC	MSCHE	NECHE	NWCCU	WSCUC
Institutional Report	✓	✓	✗**	✓	✓	✗****
Peer Review Visit	✓*	✗	✗	✗	✓	✗
Description	Fifth Year Interim Report	Assurance Review	No mid-cycle report	Interim (Fifth-Year) Report	Mid-Cycle Review	No mid-cycle report
	<ul style="list-style-type: none"> Institution completes a summary, compliance certification, & Quality Enhancement (QEP) Impact Report Committee members review submitted materials & QEP 	<ul style="list-style-type: none"> Institution develops a report that demonstrates compliance with standards Reviewers evaluate report 		<ul style="list-style-type: none"> Institution develops a report that demonstrates compliance with standards & describes plans for the period before reaffirmation Commission reviews report 	<ul style="list-style-type: none"> Institution develops a report that demonstrates evidence of mission fulfillment Policies, Regulations, & Finances Review*** <ul style="list-style-type: none"> Desk audit reviewing governance, resources, & capacity 	

*SACSCOC requires a visit if institution has established five (5) or more approved off-campus instructional sites that have not hosted a visit since the last reaffirmation.

**MSCHE includes an interim report on its website, but suggested we exclude this report from our estimates as it is under review. Member institutions must undergo a self-study as part of reaffirmation. Therefore, this review is included in the cost estimates, but not the timeline overview.

***The Policies, Regulations, & Finances review by NWCCU occurs at year 6 of the accreditation process. The review is included in the above table to capture standard reviews throughout the accreditation cycle.

****No standard interim report is required by WSCUC; however 90% of member institutions undergo some type of interim review at various points of time determined on a case-by-case basis. Therefore, this review is included in the cost estimates, but not the timeline overview.

Accreditation Process

Quality Initiative Reports



While all accreditors require institutions to adhere to certain standards to ensure quality & self-reflection, SACSCOC & HLC also require institutions to demonstrate continuous improvement for specific issues or initiatives

SACSCOC: Quality Enhancement Plan

- The Quality Enhancement Plan (QEP) is part of the SACSCOC reaffirmation process whereby each institution focuses on an issue important for student learning outcomes and/or student success
- Institutions develop a document for review outlining their QEP
- Institutions develop a report describing outcomes after five years of QEP implementation

QEP examples

- "Writing Around the Curriculum" program, which is an institutional initiative focused on improving student writing skills
- "Artificial Intelligence (AI), Data, & Emotional Intelligence (EI): Critical Skills for the 21st Century," a program meant to close the gap between career readiness & employer expectations in AI, data, & EI

HLC: Quality Initiative Proposal

- Institutions designate one major improvement effort undertaken during its 10-year accreditation cycle
- Each institution submits a Quality Initiative Proposal for peer review
- At the conclusion of the quality initiative, each institution submits a report reflecting on the process

Quality Improvement Initiative Examples

- A four-year institution joins with community colleges to create a program of dual admission, joint recruitment & coordinated curriculum & student support
- The institution pursues a strategic initiative to improve its financial position



Current Annual Costs

SACSCOC Cost Overview

Accreditation costs include both university expenses & fees paid to the accreditor

- The vast majority of accreditation costs are university expenses necessary to comply with requirements (e.g., personnel, software, & consultants)
- Some university expenses & accreditation fees will likely increase during the transition to a new accreditor

Accreditation Fees

- Start-up fees
- Monitoring/Reaffirmation fees
- Annual dues



Year Over Year Average
\$220K- \$250K

- Over the next six years, institutions estimated they will pay \$1.5 million in required fees to SACSCOC
- Most of the fees provided to SACSCOC over the next six years are associated with annual dues

University Expenses

- Personnel
- Consultants
- Software
- Reporting requirements
- Accreditation cycle
- Site visits



Year Over Year Average
\$11M- \$13M

- These expenses vary year-to-year based on where each university is in the accreditation process
- Expenses & workload will temporarily increase during the transition to a new accreditor

*Estimates are based on fees & university expenses reported by State University System of Florida universities.

Estimated Accreditation Cycle Costs

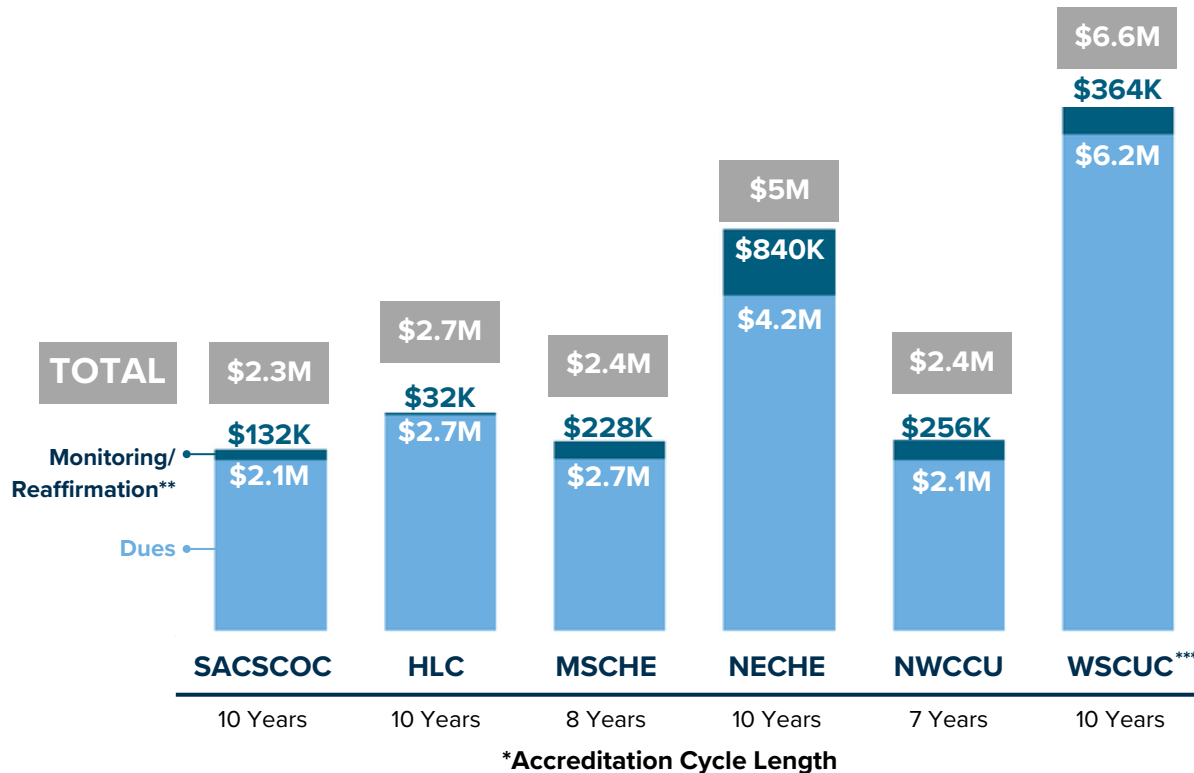
Total Fees -- System-wide Snapshot



Cost Estimate Methodology

- Costs are specific to each institution
- Estimates provided are based on information available on each accreditor's website & were reviewed by accrediting agency staff

Accreditation Fees*



University Expenses

Changing accreditors likely will not significantly change annual university expenses

**For more details on monitoring/reaffirmation costs, see Appendix B.

***Universities may be on a 6, 8, or 10 year cycle depending on institutional readiness.

Accreditation Fees

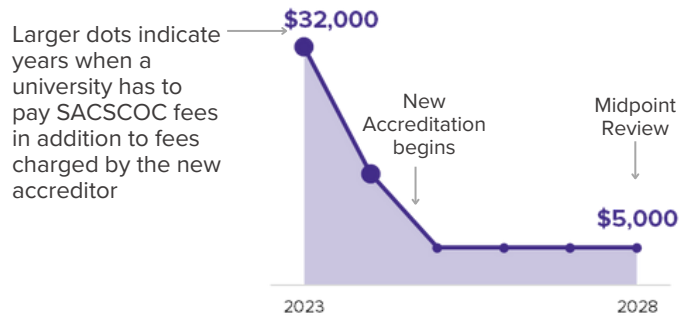
Florida Poly Estimates



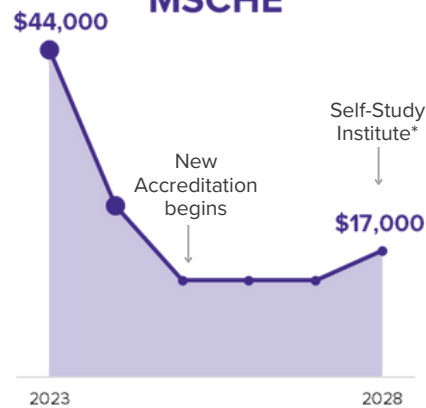
FLORIDA POLYTECHNIC
UNIVERSITY

- Once triggered in 2023, FLPOLY will pay both new accreditor application fees & any required SACSCOC fees to maintain accreditation until they are accredited by the new agency
- Over time, HLC fees will be the lowest followed by MSCHE

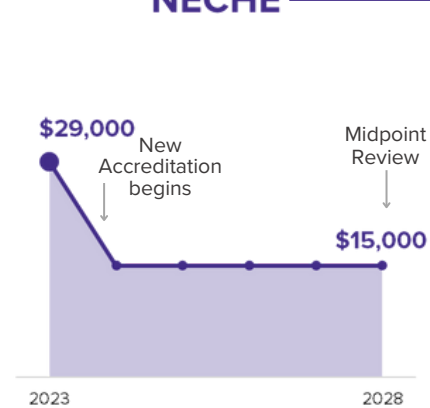
HLC



MSCHE

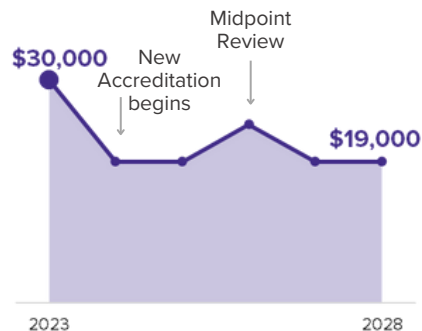


NECHE



NECHE does not charge monitoring costs; however, reaffirmation costs are twice the annual dues (occurs every 10 years)

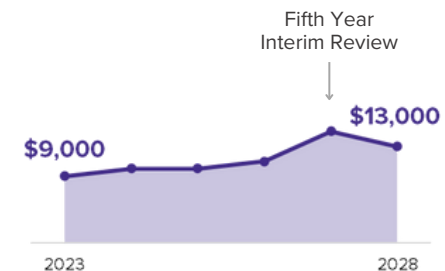
NWCCU



WSCUC



SACSCOC



Note: The above estimates assume the application process for WSCUC will take 1.5 years & that the application process for NWCCU will take 1 year. The above estimates show accreditation fees, not university expenses. University expenses will increase during the period of time that universities are maintaining accreditation with SACSCOC & applying for new accreditation.

*MSCHE includes an interim report on its website, but suggested we exclude this report from our estimates as it is under review. Member institutions must undergo a self-study as part of reaffirmation. Therefore, this review is included in the cost estimates, but not the timeline overview.

**No standard interim report is required by WSCUC; however 90% of member institutions undergo some type of interim review at various points of time determined on a case-by-case basis. Therefore, this review is included in the cost estimates, but not the timeline overview.

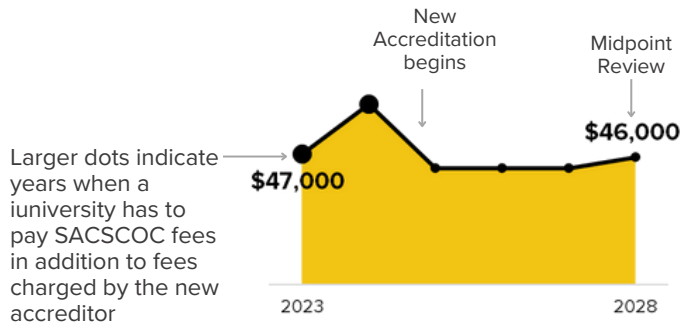
Accreditation Fees

UCF Estimates

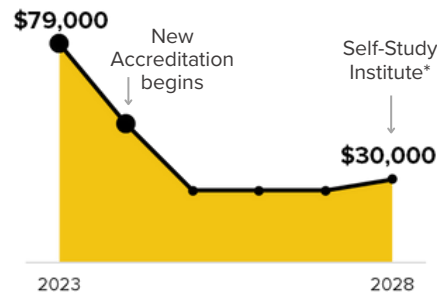


- Once triggered in 2024, UCF will pay both new accreditor application fees & any required SACSCOC fees to maintain accreditation until they are accredited by the new agency
- Over time, MSCHE fees will be the lowest followed by NWCCU

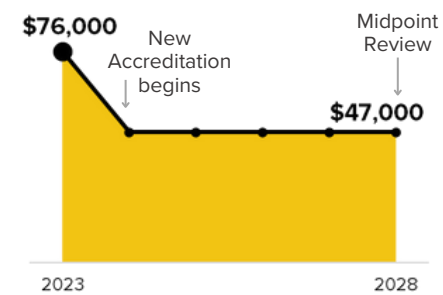
HLC



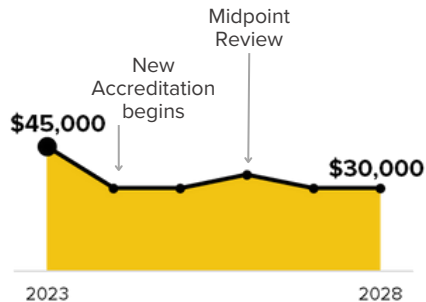
MSCHE



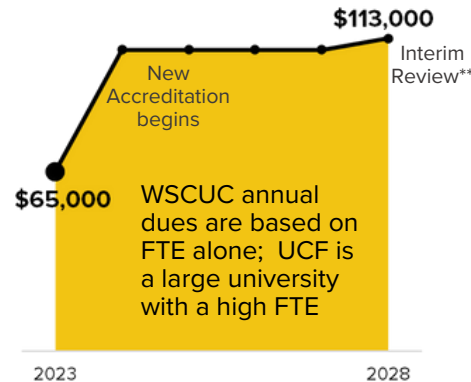
NECHE



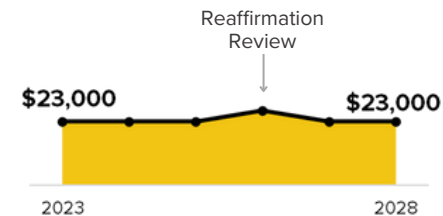
NWCCU



WSCUC



SACSCOC



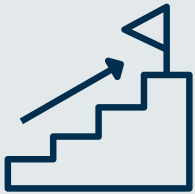
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Accreditation Fees

Start-Up Fees -- System-wide



Start-Up Fees for Accreditation

- Start-up costs are non-recurring
- Overall, HLC & NWCCU offer the lowest start-up fees
- Most accreditors reduce costs for currently accredited institutions, such as those in the State University System
- Most accreditors have an accelerated pathway to accreditation for currently accredited institutions in good standing
- MSCHE is in the process of developing an accelerated pathway for currently accredited institutions

What are start-up costs?

Start-up costs include

- Application fees
- Eligibility fees
- Site visits
- Required training

\$551,000

\$480,000

\$435,000

\$292,000

\$276,000

HLC

MSCHE

NECHE

NWCCU

WSCUC

Reduced Fees for Currently Accredited Institutions



Accelerated Pathway for Accreditation



Cost Range Across Universities

\$23,000

\$35,000
\$72,000

\$19,000
\$52,000

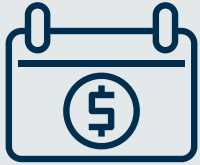
\$21,000
\$31,000

\$32,000
\$49,000



Accreditation Fees

Annual Dues -- System-wide

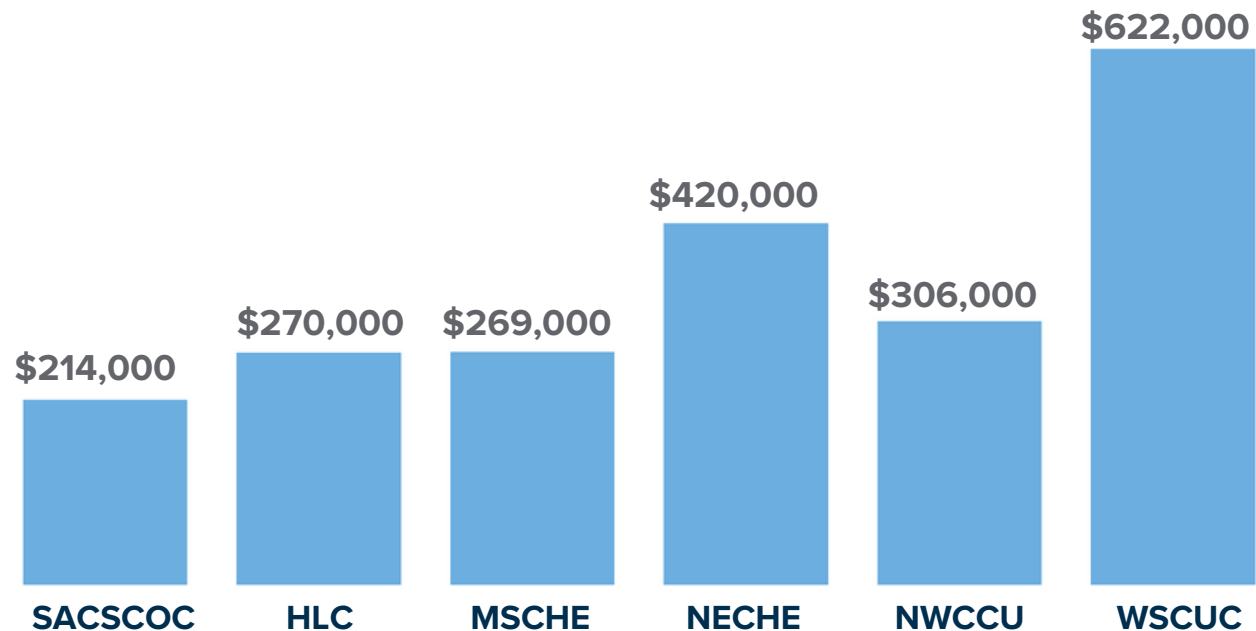


Annual Dues for Accreditation

- The chart below shows one year of dues across all universities
- Overall, HLC & MSCHE offer the lowest annual dues
- Several accreditors use expenditure data to determine annual dues for member institutions

What are annual dues?

- Annual dues are required by all accreditors
- These dues are a recurring expense for each university
- Annual dues may include
 - Base dues
 - FTE calculation
 - Expenditure calculations
 - Campus activity fees



	SACSCOC	HLC	MSCHE	NECHE	NWCCU	WSCUC
Base Dues	✓	✓				
Expenditures	✓		✓	✓	✓	
FTE	✓	✓		✓		✓
Branch Campuses/Additional Locations		✓		✓	✓	
Cost Range Across Institutions	\$9,000 \$29,000	\$5,000 \$52,000	\$13,000 \$44,000	\$14,000 \$47,000	\$19,000 \$30,000	\$13,000 \$109,000



University Expenses

Additional Costs -- Site Visits

Estimates in this document consider base costs for other accreditors; however, universities will incur additional costs not included in the estimates provided



Universities cover the cost of travel, lodging, & food for evaluators during visits



Some accreditors require honoraria be paid for the evaluators' time



Number of days & number of evaluators may be reduced for special visits

Site Visits Occur During

- ✓ Initial Accreditation
- ✓ Reaffirmation
- ✓ Some Mid-Cycle Reviews

Site Visit Information						
Cost Type	SACSCOC	HLC	MSCHE	NECHE	NWCCU	WSCUC
Evaluators for Review	8-10	5-7	7-9	7-10	3-5	5
Review Time Period	4 Days	3 Days	3 Days	3 Days	2.5 Days	3 Days
Honoraria	✓ *	✓ **	✓ ***	✗	✗	✗

Note: All estimates provided are from accreditor websites & conversations with accrediting agency staff

*Committee chairs receive \$300 & committee members receive \$150 for incidental expenses.

**Honoraria varies based on review type ranging from \$125 for a Contractual Arrangement Substantive Change Review to \$1,000 for a Year 4 Assurance Review. Honoraria for peer reviewers involved in comprehensive evaluations, initial accreditation visits, & reaffirmation is \$700.

***Honoraria varies based on visit type ranging from \$50 for team members during Self-study Evaluations & Application for Candidate Status to \$800 for a Complex Substantive Change Review.