

MARYLAND HIGHER EDUCATION COMMISSION
ACADEMIC PROGRAM PROPOSAL

PROPOSAL FOR:

- NEW INSTRUCTIONAL PROGRAM
 SUBSTANTIAL EXPANSION/MAJOR MODIFICATION
 COOPERATIVE DEGREE PROGRAM
 WITHIN EXISTING RESOURCES or REQUIRING NEW RESOURCES

(For each proposed program, attach a separate cover page. For example, two cover pages would accompany a proposal for a degree program and a certificate program.)

Mount St. Mary's University
Institution Submitting Proposal

August 22, 2016
Projected Implementation Date

Award to be Offered Post-Baccalaureate Certificate
in Forensic Accounting
Title of Proposed Program

Suggested HEGIS Code 43.0117
Suggested CIP Code

Business Mary Beth Graham
Department of Proposed Program Name of Department Head

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Paul W. Ezy President/Chief Executive Approval
Signature and Date

March 14, 2016 Date Endorsed/Approved by Governing Board
Date

Mount St. Mary's University
Academic Program Proposal

for

GRADUATE CERTIFICATE IN FORENSIC ACCOUNTING AND FRAUD INVESTIGATION

A. Centrality to institution mission statement and planning priorities:

- 1. Provide a description of the program, including each area of concentration (if applicable), and how it relates to the institution's approved mission.**

The Richard J. Bolte, Sr. School of Business at Mount. St. Mary's University (MSMU) currently offers a 120-credit hour undergraduate degree program leading to a Bachelor of Science in Accounting. However, in order to become a Certified Public Accountant (CPA), all states now require 150 credit hours of college-level or graduate study¹. This is a proposal by MSMU for a graduate level, academic credit certificate in Forensic Accounting and Fraud Investigation, herein referred to as the "MSMU FA GC". This 15-hour program will provide an opportunity for those seeking to acquire or improve their skills, knowledge and abilities in the emerging area of forensic accounting and fraud investigation. In addition, accounting undergraduates can also use this program as a means to achieve additional hours toward the 150-hours of academic credit required to sit for the CPA exam.

This program builds on the university's mission to provide students with a high-quality education in a relevant and emerging professional discipline while holding to the university's position as an institution of higher education dedicated to the pursuit of the truth.

The proposed curriculum for the MSMU FA GC is grounded in the literature pertaining to fraud and forensic accounting and its practice today. In 2003, West Virginia University (WVU), with funding from the National Institute of Justice, organized a Technical Working Group comprised of a diverse group of content area experts in the field of forensic accounting to examine fraud and forensic accounting issues and develop model curriculum guidelines. Members of the WVU working group represented corporate and industry stakeholders, professional services providers, law enforcement, the legal community, government and regulatory stakeholders, professional organizations, and academics specializing in fraud and forensic accounting. WVU issued a special report, entitled, *Education and Training in Fraud and Forensic Accounting: A Guide for Educational Institutions, Stakeholder Organizations, Faculty, and Students*, (2007); the findings set the standard for forensic accounting programs in the U.S.²

As stated in the Overview of the WVU report "As a result of recent, highly publicized financial scandals; reported increases in occupational fraud; and heightened concerns over money

¹ <http://www.aicpa.org/becomeacpa/licensure/requirements/Pages/default.aspx>

² <https://www.ncjrs.gov/App/Publications/abstract.aspx?ID=239254>

laundering to support terrorism and racketeering, legislative mandates and public expectations have heightened the necessity to further define the auditor's and accountant's responsibility for detecting fraud within organizations. Successful fraud or forensic accounting analyses and findings reported by practicing professionals may be the difference between whether perpetrators avoid detection of their illegal activities or they are brought to justice. In most cases, success is directly and primarily dependent upon the knowledge, skills, and abilities of the professionals performing the work. Consequently, the demand for entry-level professionals with formal education in fraud and forensic accounting has grown."³

The WVU report identified the following primary content areas for fraud and forensic accounting curricula as follows:

- (1) Criminology, specifically oriented to the nature, dynamics, and scope of fraud and financial crimes; the legal environment; and ethical issues.
- (2) Fraud prevention, deterrence, detection, investigation, and remediation:
 - a. Asset misappropriation, corruption, and false representations;
 - b. Financial statement fraud; and
 - c. Fraud and forensic accounting in a digital environment, including:
 - (i) Computer-based tools and techniques for detection and investigation;
 - (ii) Electronic case management tools; and
 - (iii) Other issues specific to computerized environments.
- (3) Forensic and litigation advisory services, including research and analysis, valuation of losses and damages, dispute investigation, and conflict resolution (including arbitration and mediation).⁴

The proposed MSMU FA GC Program is designed to capture all three of the above content areas in its forensic accounting core course curriculum. This means that the MSMU FA GC Program will not just focus on the fraud content area, but will also include the other content areas involved in forensic accounting, namely criminology, and forensic and litigation advisory services.

Many institutions of higher education offer programs in forensic accounting, however, they focus solely or primarily on fraud investigation and fraud-related content. In the U.S., there is high demand for forensic accountants trained in the other disciplines within the forensic accounting field, such as litigation support and expert testimony, business valuation, data analysis, and bankruptcy, insolvency and reorganizations.

In response to growing demand, the American Institute of Certified Public Accountants (AICPA) established the Certified in Financial Forensics (CFF) credential in 2008 for CPAs specializing in forensic accounting. The exam content for the CFF credential is as follows⁵:

³ <https://www.ncjrs.gov/pdffiles1/nij/grants/217589.pdf>

⁴ <https://www.ncjrs.gov/pdffiles1/nij/grants/217589.pdf>

⁵ http://www.aicpa.org/InterestAreas/ForensicAndValuation/Membership/DownloadableDocuments/2013%20CFF%20Exam%20Content%20Specification%20Outline_FinalWEB.pdf

- I. **Professional Responsibilities and Practice Management (5%– 10%)**
 - A. AICPA
 - B. CPA Professional Responsibilities in Civil and Criminal Matters
- II. **Fundamental Forensic Knowledge (30%– 50%)**
 - A. Laws, Courts and Dispute Resolution
 - B. Planning and Preparation
 - C. Information Gathering and Preserving
 - D. Discovery
 - E. Reporting, Experts and Testimony
- III. **Specialized Forensic Knowledge (40%– 50%)**
 - A. Bankruptcy, Insolvency and Reorganization
 - B. Electronic Data Analysis
 - C. Damages Calculations
 - D. Family Law
 - E. Financial Statement Misrepresentations
 - F. Fraud Prevention, Detection and Response
 - G. Valuation

In addition, the Association of Certified Fraud Examiners (ACFE), the world's largest anti-fraud organization and premier provider of anti-fraud training and education⁶, confers the designation of Certified Fraud Examiner (CFE) to denote proven expertise in fraud prevention and detection. The CFE credential is recognized in the hiring and promotion policies of leading organizations around the world. The CFE credential does not require the CPA designation as many CFEs come from other disciplines such as business and criminal justice, besides accounting.

It is the goal of the MSMU FA GC Program to not only help prepare students wishing to pursue a career in forensic accounting, but also to help prepare for the CFF and CFE exams, as well as the CPA exam.

Congruence with MSMU Mission

The Mission Statement of Mount St. Mary's University reads as follows:

Mount St. Mary's is a Catholic university committed to education in the service of truth; we seek to cultivate a community of learners formed by faith, engaged in discovery, and empowered for leadership in the Church, the professions, and the world.

Forensic accountants are tasked with finding the truth. Even as an expert witness hired by an attorney or client in a dispute, the forensic accountant is tasked with being an advocate for the truth and not for one side or the other. The MSMU FA Program aligns with the University's

⁶ www.acfe.com

mission statement by training future forensic accounting professionals to be committed to education in the service of the truth.

Our Undergraduate Mission is as follows:

Mount St. Mary's is a Catholic institution of higher education dedicated to liberal learning in the pursuit of truth. Mount St. Mary's, mindful of its role in the Church's mission to the world and respectful of the religious liberty of all, affirms the values and beliefs central to the Catholic vision of the person and society, and seeks to deepen understanding of our faith and its practice in just and compassionate engagement with the world. In order to enable individuals to understand and to challenge or embrace the cultural forces operating on them, Mount St. Mary's, in all its curricular and co-curricular programs, encourages each student to undertake free and rigorous inquiry leading to a reflective and creative understanding of the traditions which shape the communities in which we live. Mount St. Mary's strives to graduate men and women who cultivate a mature spiritual life, who live by high intellectual and moral standards, who respect the dignity of other persons, who see and seek to resolve the problems facing humanity, and who commit themselves to live as responsible citizens.⁷

The MSM FA GC Program seeks to graduate men and women who will enter an ever changing and dynamic society and workforce and face the challenges presented by contributing to society in a profession designed to discover the truth and assist humanity curb the ever-growing problem of white-collar crime, legal disputes, and other financial and business conflicts.

2. Explain how the proposed program supports the institution's strategic goals and provide evidence that affirms it is an institutional priority.

The Richard J. Bolte, Sr. School of Business Mission Statement, led by Dean Karl W. Einolf, Ph.D., reads as follows:

The Richard J. Bolte, Sr. School of Business, proudly integrated in a Catholic University, fosters the divine calling of business professionals who consider the dignity of the human person, who apply the highest standards of personal integrity, and who serve the common good.

In this context, the Bolte School builds innovative educational programs, advances knowledge through quality scholarship, promotes responsible business practices, and develops future leaders who are ethical decision-makers and effective problem-solvers.

Ultimately, the Bolte School seeks to positively influence global communities by considering people as well as profits, morality as well as market share, and service as well as self.

Innovation is key to our course development. The MSMU FA GC Program, as an online program, will be the first of its kind in the state of Maryland and surrounding geographical area. MSMU is proposing this program in response to the demand for accounting professionals with specialized knowledge, skills, and abilities in the practice of forensic

⁷ <https://msmary.edu/about-the-Mount/Mission.html>

accounting. Many higher education institutions in the U.S. offer a master's or graduate certificate programs in forensic accounting, but is very skewed toward criminology, cybercrime and fraud, and do not offer the other disciplines within forensic accounting such as litigation support and commercial damages, business valuation and bankruptcy and insolvency accounting. MSMU strongly believes that forensic accountants need to be trained not only in fraud and fraud investigation, criminology and cybercrime (all subjects matter covered in our program), but also the other disciplines associated with forensic accounting.

MSMU believes it is on the cutting edge of accounting education by offering a graduate certificate program in forensic accounting, which supports the MSMU's strategic goals and is an institutional priority.

B. Adequacy of curriculum design and delivery to related learning outcomes:

The MSMU FA GC Program requires the successful completion of 5 graduate courses in Forensic Accounting related topics, resulting in a total of 15 graduate level credit hours. The courses will be offered in an online format in successive 8-week sessions utilizing the MSMU online learning platform.

Acceptance into the MSMU FA GC Program will be based upon students meeting the following minimum requirements:

1. Hold a bachelor's degree in a relevant field of study such as business, accounting, finance, criminology, or economics.
2. Have a cumulative grade point average of 3.0, from an accredited college or university. Conditional acceptance will be at the Program Director's discretion based on the strengths of the candidate's application.
3. Submission of transcripts from all college or universities attended.
4. A personal essay on why they desire to pursue the program.
5. Three letters of recommendation.
6. Completed application.

The proposed MSMU FA GC Program Forensic Accounting and Fraud Investigation courses will consist of: (1) Forensic Accounting and Fraud Investigation, (2) Fraudulent Financial Reporting, (3) Forensic Data Analytics and Electronic Evidence, (4) Interviewing Techniques and Legal and Ethical Issues for Forensic Accountants, and (5) Litigation Services and Expert Testimony.

1. Provide a list of courses with title, semester credit hours and course description, along with a description of program requirements.

The MSMU FA GA curriculum courses consist of the following:

FORENSIC ACCOUNTING AND FRAUD INVESTIGATION CURRICULUM COURSES:

		Course Title	Hrs.	Status
1	XXXX 601	Forensic Accounting and Fraud Investigation	3	New
2	XXXX 602	Fraudulent Financial Reporting	3	New
3	XXXX 603	Forensic Data Analytics and Electronic Evidence	3	New

4	XXXX 604	Interviewing Techniques and Legal and Ethical Issues for Forensic Accountants	3	New
5	XXXX 605	Litigation Services and Expert Testimony	3	New
Total Core Forensic Accounting Courses			15	

A student may apply the five online graduate certificate courses to the Mount's traditional on-ground MBA program and earn the MBA degree by completing the following seven courses (22 credits):

1. MBA 501 Management Skills Development (3 credits)
2. MBA 504 Global Business and Economics (3 credits)
3. MBA 505 Strategic Marketing (3 credits)
4. MBA 509 Financial Analysis (3 credits)
5. MBA 516 Organization Theory and Management Practice (3 credits)
6. MBA 519 Strategic Analysis and Integrated Decision Theory (4 credits)
7. MBA 536 Business Ethics and Social Responsibility (3 credits)

Course Descriptions for the 5 forensic accounting graduate courses:

1. XXX 601 - Forensic Accounting and Fraud Investigation (3 credit hours)

This course explores the process and methodology of conducting a fraud investigation from the initial tip or predication through the issuance of the forensic accountant's report and potential testimony in a court of law, including civil, criminal and private settlement actions. The course will utilize real live case studies that employed various fraud schemes including fraudulent financial reporting, misappropriation of assets, bribery and corruption, and cybercrime. Students will apply various forensic accounting techniques and tools in investigating the fraud and presenting their findings before a trier of fact or arbitrator. This course will also examine the nature of white-collar crime and current research and thinking on why people commit fraud and other white-collar crimes.

2. XXX 602 – Fraudulent Financial Reporting (3 credit hours)

This course examines the evolution of financial reporting, the various schemes in which management and others perpetrate fraudulent financial reporting, and lawmaker's attempts to enact laws and regulations to mitigate the problem. The course will utilize some of the most egregious financial reporting fraud cases in recent history and examine what contributed to the ability of management to perpetrate the fraud. Students will learn the various types of financial fraud schemes employed and what corporations can do help mitigate the incentives to perpetrate financial reporting fraud and ways to help detect it. This course will provide an in-depth review of The Public Company Accounting Reform and Investor Protection Act of 2002, known as the Sarbanes-Oxley Act of 2002, and how this historic legislation has had an impact in preventing future financial reporting frauds.

3. XXX 603 - Forensic Data Analytics and Electronic Evidence (3 credit hours)

This course will concentrate on basic and advanced tools and techniques to detect and investigation fraud in a computerized digital environment. Emphasis will be placed on computer assisted forensic techniques utilizing modern day software and other computer tools. Students will also learn various statistical and data analysis techniques with attention payed to applying proper data extraction processes and extraction

techniques and assuring data quality and integrity. Students will also learn computer forensic crime scene procedures and federal and state laws governing the use of digital forensic evidence in court.

4. **XXX 604 - Interviewing Skills and Legal and Ethical Issues of Forensic Accounting (3 credit hours)**

This course examines the use of interviews and interrogations in forensic accounting and fraud investigations and their distinction. Students will learn how interviews and interrogations are conducted through live role playing and observing. Students will learn the various techniques and methodologies used in gathering pertinent information in interviews and obtaining confessions in interrogations. This course will examine the legal system in the United States including the criminal justice system and the civil court system at the federal, state and local levels. In addition, it will cover the various standards governing forensic accountants in conducting their services and professional ethics and responsibilities. The course will include topics such as the Federal Rules of Evidence (FRE) of civil and criminal procedures, Federal Rules of Civil Procedure (FRCP), Federal Rules of Criminal Procedure (FRCrP), legal privileges pertaining to the forensic accountant, Sarbanes-Oxley Act, Foreign Corrupt Practices Act, Federal False Claims Act, Federal Securities Law, and Federal Tax Crimes.

5. **XXX 605 - Litigation Services and Expert Testimony**

This course will examine the various ways that forensic accountants are employed in judicial matters by organizations, attorneys, and the courts, including areas such as economic damages, commercial damages, bankruptcy proceedings, matrimonial and family law, shareholder litigation, intellectual property, professional malpractice, merger and acquisitions, and valuation matters. In addition, the course will examine the role of the forensic accountant as a consulting and testifying expert, legal challenges to the forensic expert, forensic reports and the Federal Rules of Civil Procedure, preparing for depositions and trial testimony, legal tactics in deposing and cross-examination of the expert.

2. **Describe the educational objectives and intended student learning outcomes.**

The overall educational objective of the MSMU FA GA Program is to provide students interested in pursuing careers in the field of forensic accounting with the fundamental knowledge, skills and abilities necessary to enter entry level jobs in this field or enhance their skills in their current employment and reap the benefits of higher salaries and opportunity for advancement.

Employers of forensic accounting graduates include, but are not limited to, professional services firms such as the Big-4 accounting firms; specialized consulting firms such as FTI and RGL Forensics; public and private corporations in internal audit, compliance, and finance and accounting; government or regulatory agencies such as the SEC, IRS, Homeland Security, Government Accounting Office (GAO), Offices of Inspector General, Public Company Accounting Oversight Board (PCAOB), and the Consumer Financial Protection Bureau (CFPB); law enforcement agencies such as the FBI, U.S. Bureau of Alcohol Tobacco, Firearms and Explosive; and legal services organizations including law firms.

Intended student learning outcomes

Upon successful completion of the MSMU FA GC Program, a MSMU student will have acquired an understanding of the following:

Fraud and Fraud Investigations

- the theories of crime causation, focusing on who commits fraud and why;
- the nature, dynamics, and scope of fraud and financial crimes;
- the impact of criminal behavior, motivation and other attributes on interviewing and interrogations;
- the civil, criminal and regulatory systems;
- the criminal justice system at the Federal and applicable state levels;
- the civil litigation process;
- the regulatory system and Acts such as the SEC, PCAOB, Sarbanes-Oxley, IRS etc.;
- the standards of conduct for performing litigation-type services;
- the discovery process, attorney-client privilege and attorney work product, privacy and rules of evidence;
- the importance and impact of effective corporate governance mechanisms;
- legal remedies including criminal, civil, and other negotiated non-judicial remedies;
- the various source of information and guidance for fraud and forensic accounting;
- the alternative theories of business ethics and an understanding of the role of ethics in the context of corporate governance and the inappropriate use of corporate assets by management and employees;
- personal and various professional codes of ethics;
- differences between financial statement auditors and forensic-fraud auditors;
- who commits fraud and why, by using fraud statistics and the fraud triangle;
- elements of fraud;
- various acts of fraud and "The Fraud Tree";
- the basic concept of "red flags" (fraud risk factors), anomalous relationships, events, conditions, or symptoms that indicate an increased probability of fraud;
- fraud prevention, deterrence, detection, investigation, and remediation;
- critical thinking and approaches to unstructured problem solving;
- the anti-fraud environment, processes and controls;
- the elements of antifraud techniques and controls;
- fraud risk assessment;
- internal controls to identify opportunities of fraud, the risk of management override and the possibility of collusion;
- manual and automated controls;
- the different procedures available to proactively search for fraud when symptoms of fraud have not been specifically identified, including data-mining and other digital analysis tools;
- the different fraud examination methodologies and procedures in gathering and evaluating evidence;
- the importance of interviewing and interrogations and the different techniques for conducting interviews and interrogations and factors that impact the effectiveness of interviewing;
- ratio analysis and other analytical techniques;
- the different types of evidence and uses of observation and surveillance;

- the methods by which fraud is concealed;
- the methods by which perpetrators hide assets;
- the various sources of public and private information and how to search databases;
- working paper development and documentation of work performed;
- the various forms of engagement communications, including written reports, graphical presentation, and oral testimony;
- the different types of remediation, including civil litigation and criminal prosecution, arbitration and mediation, restitution, and insurance claims;
- the different techniques available to estimate the amount of losses and implement the processes available for seeking restitution;
- the need for fraud prevention and deterrence through the identification of internal control deficiencies and determination of vulnerabilities and/or root causes of fraud;
- the major areas of financial statement fraud;
- financial statement analysis techniques;
- audit techniques and procedures for detecting fictitious transactions and events;
- the importance of management estimates to the financial reporting process;

Forensic Digital Analysis

- information technology (IT) governance and IT risk assessment;
- transaction processing systems, including both manual and computerized controls;
- the ways in which IT systems are typically used in frauds and other crimes;
- how IT security is commonly breached or circumvented;
- the special requirements for digital evidence collection and preservation for forensic investigations;
- the various types of digital evidence that can be used in an investigation such as metadata in documents, e-mail headers and tracers, and security and audit logs;
- how forensic accountants interact with other specialists in coordinating vulnerability testing, ethical hacking, or intrusion detection;
- the rules related to e-discovery;
- the files affected by various fraud activities and schemes and familiarity with the relationships among various electronic files;
- the various tools available to capture digital evidence and techniques to recover deleted files;
- the various software packages available for case management;
- the general knowledge of tool and techniques used by forensic computer scientists for retrieving files from seized computers and of how the work of forensic accountants must be coordinated with forensic computer specialists;
- the various types of cybercrime;
- the laws related to cybercrime;

Litigation and Expert Advisory Services

- the various disciplines comprised in forensic accounting and that forensic accounting encompasses every branch of accounting knowledge, and consists of two major components: investigative services and litigation-related services;
- criminal, civil, and administrative engagements and the types of forensic and litigation advisory services provided (e.g. lost wages, valuations, construction delays, business interruption, insurance claims, divorce, fraud, antitrust, intellectual property, environmental, and tax, etc.);
- the qualifications for the fraud and forensic accountant to support a litigation activity, including credibility and reliability related to the work to be completed;
- the differences between testifying expert witnesses and non-testifying advisors and consultants;
- the various approaches to research and analysis;
- the various approaches to financial and economic modeling and how to use authoritative sources for model selection;
- the rules of evidence as they apply to forensic and litigation advisory services and an understanding of the assertion of legal privilege;
- the nature and purpose of damages, including remedies;
- the types of damages to include restitution, reliance and punitive;
- the areas related to commercial damages including the types of damages, nature and purpose of commercial damages, development of economic damages models, and various cost behaviors;
- the nature and purpose of business valuations and familiarity and compliance with the professional valuation standards.

3. Discuss how general education requirements will be met, if applicable.

There are no general education requirements in this program.

4. Identify and specialized accreditation or graduate certification requirements for this program and its students.

There are no specialized accreditation or graduate certification requirements for this program and its students.

5. If contracting with another institution or non-collegiate organization, provide a copy of the written contract.

We currently do not contemplate contracting with another institution or non-collegiate organization in connection with this proposed program.

C. Critical and compelling regional or Statewide need as identified in the State Plan:

1. Demonstrate demand and need for the program in terms of meeting present and future needs of the region and the State in general based on one or more of the following:

The need for the advancement and evolution of knowledge

Forensic accounting has been around since ancient Egypt when scribes of the Pharaoh took inventory of his valuable assets like grain and gold. Embezzlement and bribes were a great concern even to those in ancient times, although the penalties were often much harsher. Buckstien (n.d.) points out “for example, in Mesopotamia and Egypt between 3300 B.C. and 3500 B.C., there is archeological evidence that accountants (or scribes) visually recorded commercial monetary transactions using damp clay tablets or papyrus. To prove records had not been altered, the original document would be enfolded into a clay envelope. Any evidence of tampering would result in an investigation, and any wrongdoing could ultimately result in a fine, or a much worse fate involving mutilation or death.”⁸

As a result of the many fraudulent accounting scandals in the early 2000s such as Enron and WorldCom, specific changes came about in the accounting profession. “Public accountants faced a crisis in the spring of 2002. More than 300 earnings restatements in the United States during 2000 and 2001 revealed just how illusory profits reported during the 1990s had been. Enron’s bankruptcy in December 2001 shattered investor’s confidence, launching a 2,000 point decline in the Dow Jones Industrial Average.” (Clikeman, 2013)⁹ Arthur Andersen, one of the oldest and well respected accounting firms, ceased to exist as a result. Clikeman concludes “Certified Public Accountants, once held in high esteem, fell below politicians and journalists in public opinion polls.” (Clikeman, 2013)¹⁰

Unfortunately, accounting frauds continue today. Thus, there is more and more pressure on today’s accounting students to have adequate training in forensic accounting before they enter the profession. Epps and Tribe (2008) posits “During the years following the financial scandals surrounding Enron, WorldCom, HealthSouth, Adelphia, Tyco, and Arthur Andersen – just to name a few – the accounting profession has been witness to a rising demand for professionals trained in Forensic Accounting.”¹¹

2. Provide evidence that the perceived need is consistent with the Maryland State Plan for Postsecondary Education.

The *Maryland Ready: 2013-2017 Maryland State Plan for Postsecondary Education* states “It is our sincere belief that the key tenets of *Maryland Ready*, if supported by all members of the postsecondary community and other partners and stakeholders, will move the State toward enrolling and graduating more Maryland residents who are seeking world-class training and educational opportunities. If the goals stated herein are applied and implemented, Maryland will also make further progress toward becoming the destination of choice for students from other states and countries seeking educational experiences of the highest caliber.”

⁸ http://www.cga-pdnet.org/non_verifiableproducts/articlepublication/forensicaccounting/forensicaccounting_p1.pdf

⁹ Clikeman, P. (2013). *Called to Account*. 2nd Ed. New York, NY: Routledge

¹⁰ Clikeman, P. (2013). *Called to Account*. 2nd Ed. New York, NY: Routledge

¹¹ Epps J. and Tribe, T. (2008). *Forensic Accounting in Higher Education*. NACVA Ambassadors’ QuickRead-November 2008

In the state of Maryland, there is no comparable graduate certificate program to the proposed MSMU FA GC Program.

Mount St. Mary's University is also proposing a new undergraduate major in Forensic Accounting (under a separate proposal document). Assuming the undergraduate program is approved, it will be one of the few undergraduate programs in the country and it will draw students interested in pursuing forensic accounting to MSMU and the state of Maryland. In addition, with MSMU being so close to Washington, D.C. where all the government agencies involved in forensic accounting, namely the FBI, SEC, IRS, DOJ, Inspector General Offices of other federal agencies, among others, should draw graduates to locate in the Washington, D.C. area including Maryland.

D. Quantifiable & reliable evidence and documentation of market supply & demand in the region and State:

Recent attention to highly-publicized financial scandals involving white collar crimes, computer embezzlement, and fraudulent money laundering—particularly in the financial sector—has resulted in a growing demand for auditors and accountants who are responsible for detecting fraud within organizations. According to the U.S. Department of Labor's Bureau of Labor Statistics (BLS), jobs in accounting and auditing are projected to grow 13 percent between 2012 and 2022.¹² The BLS expects job growth in the field of accounting to be slightly faster than the average for all occupations in the United States during this 10-year period (11 percent).

Accounting and auditing is one of 334 occupational profiles provided in the BLS's Occupational Outlook Handbook for 2014-15.¹³ Information is available on typical job duties, work environment, education, training, licensure requirements, median pay, and the job outlook for accountants and auditors coded as 13-2011 in the standard occupational codes.

Currently, there are 1,187,310 employed accountants and auditors in the United States (0.6 percent of total wage and salary employment). The median hourly wage was \$30.55 in 2012, relative to \$22.71 for all occupations. On an annual basis, accountants and auditors are paid a median salary of \$63,550 (Occupational Outlook Handbook, 2014-15).

By 2014, median hourly wages for accountants had risen to \$31.70, significantly higher than the national median pay of \$17.09 for all occupations. Annual median wages for accountants and auditors was \$65,940 in 2014 (with the lowest 10 percent earning less than \$39,930 and the top 10 percent earning more than \$111,510). The average (mean) annual wage paid to accountants

¹² Bureau of Labor Statistics, U.S. Department of Labor, Employment Projections, 2012-22, December 2013.

¹³ Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Outlook Handbook, 2014-15 Edition*, Accountants and Auditors, on the Internet at <http://www.bls.gov/ooh/business-and-financial/accountants-and-auditors.htm> (visited September 23, 2015).

was \$73,670, also higher than the national average wage of \$47,230 for all 800 occupations tracked by the Bureau of Labor Statistics' Occupational Employment Statistics (OES).¹⁴

The primary source of postsecondary education or training of accountants and auditors is a Bachelor's degree that builds on an aptitude for math, analytical thinking, and attention to details. Persons employed as accountants and auditors use their training to "examine, analyze, and interpret accounting records to prepare financial statements, give advice, or audit and evaluate statements prepared by others; install or advise on systems of recording costs or other financial and budgetary data" (OES 2014). The types of accountants and auditors range from public accountants, to management accountants (also known as cost, managerial, industrial, corporate, or private accountants), government accountants, internal auditors, information technology auditors, and fraud and forensic accountants.

Unfortunately for our purposes, the Bureau of Labor Statistics does not single out job projections for accountants who specialize in the field of fraud and forensics. We know, however, that fraud and forensic accountants are required to obtain the degree and licensure of a certified public accountant (CPA). We know that those who specialize in forensics require skills and knowledge in fraud prevention, deterrence, detection investigation, and remediation. "Often, they will work in areas where they can help to prove or disprove insurance claims and personal injury claims. They can work to help resolve business disputes, divorces, and fraud cases. In some instances, the accountant may be able to help with criminal cases as well. Accountants who work within this specialty can also testify in courts as experts."¹⁵

Graduates with degrees in fraud and forensic accounting find employment in all three sectors of the economy: the public sector, private for-profit sector, and private not-for-profit sector. They are also employed in an array of industries, the highest paying being: (1) finance and insurance (\$66,530 median annual wages in 2012), (2) manufacturing (\$65,300), (3) management of companies and enterprises (\$64,670), accounting, tax preparation, bookkeeping, and payroll services (\$63,910), and government (\$61,490). The U.S. Federal Bureau of Investigation reports that a full 15 percent of their accountants specialize in fraud and forensics, a growing portion of their targeted hires.

1. Present data and analysis projecting market demand and the availability of openings in a job market to be served by the new program.

Mount St. Mary's University is located in proximity to several states and regions where employment and wages in the accounting profession are relatively high: Pennsylvania, Washington, DC, and Maryland. For example, the state of Pennsylvania (a few miles north of the Mount's main campus in Emmitsburg) has the fifth highest state employment level of

¹⁴ Bureau of Labor Statistics, U.S. Department of Labor, Occupational Employment Statistics, May 2014 Edition. NAICS 13-2011: Accountants and Auditors.

¹⁵ Forensics Colleges, "Forensic Accountant Salary and Career Outlook," on the Internet at www.ForensicsCollege.com (visited September 30, 2015).

accountants in the country. The average hourly wage rate for accountants in Pennsylvania was \$33.71 in 2014 (\$70,120 per year). The East Central Pennsylvania nonmetropolitan area has the fifth highest employment of accountants out of all nonmetropolitan areas in the United States.

Neighboring Washington, DC (49 miles south of the Mount's main campus) contains the highest concentration of jobs for accountants in the country with 15.62 employed per thousand jobs.

Two of the top paying states for accountants are Washington, DC (first) and Maryland (fourth) where jobs pay an average of \$43.38 and \$38.64 per hour, respectively. The annual average salary paid to an accountant is \$90,220 in Washington, DC and \$80,360 in Maryland.

Notable is the number of accounting professionals employed in the Bethesda-Rockville-Frederick, Maryland Metropolitan Division. Our metropolitan division boasts of being the fifth highest paying metropolitan area for accountants in the United States at \$43.13 per hour, surpassing the average hourly pay of \$41.96 for accountants in the Washington-Arlington-Alexandria DC-VA-MD-WV Metropolitan Division.

The Robert Half 2016 Salary Guide for Accounting & Finance shows a salary range for "Forensic Accountant" as \$74,750 - \$116,750, "Fraud Investigator" as \$71,750 - \$95,500, and "Anti-Money laundering Specialist" as \$75,500 - \$99,750.¹⁶ The salary range for entry level auditors for large firms is \$59,000 - \$70,750, which indicates the large premium for forensic accountants with specialized skills, knowledge and abilities.

Statistics provided by the Bureau of Labor Statistics on employment of accountants and wages paid bode well for graduates of Mount St. Mary's University given our proximity to the largest employers of accountants in the country and the relatively higher paying regions located in Maryland, Washington, DC, and Pennsylvania. We expect these positive job prospects to continue given the occupational projections released by the BLS and the U.S. News and World Report #14 ranking of accountants in The 100 Best Jobs of 2015!

2. Discuss and provide evidence of market surveys that clearly provide quantifiable and reliable data on the educational and training needs and the anticipated number of vacancies expected over the next 5 years.

The demand for forensic accountants with requisite education and skills does not show any sign of abating. The AICPA estimates that 20,000 to 30,000 CPAs now provide forensic accounting services (Allegretti and Slepian, 2010).¹⁷ Today, 15 percent of agents employed by the Federal Bureau of Investigation (FBI) are special agent accountants.¹⁸ The Association of Certified Fraud Examiners (ACFE), the world's largest anti-fraud organization and premier provider of anti-fraud training and education, membership has grown to over 75,000 members

¹⁶ http://www.roberthalf.com/sites/default/files/Media_Root/images/at-pdfs/robert_half_2016_salary_guide.pdf

¹⁷ <http://www.aicpa.org/press/pressreleases/2010/pages/aicpareportededucatescpafirmsprofessorsonforensicaccounting.aspx>

¹⁸ https://www.fbi.gov/news/stories/2012/march/forensic-accountants_030912

from its founding in 1988.¹⁹ In addition, the American Accounting Association (AAA) created a Forensic and Investigative Accounting section for its members interested in teaching, researching and practicing in the forensic accounting area.²⁰

Kranacher, Riley, Jr., and Wells (2011) posit “The demand for students who have specialized qualifications in fraud and financial forensics has grown significantly and is likely to continue to grow. The increasing demand is creating an unprecedented opportunity for those professionals who develop the knowledge, skills, and abilities associated with fraud examination and financial forensics. For example, *The Wall Street Journal* stated “forensic accounting is a particularly hot field” (*CPA Recruitment Intensifies as Accounting Rules Evolve*, March 22, 2005). Moreover, each of the Big 4 firms is now recruiting accounting students with some exposure to financial forensics. The need for competent staffing at the SEC, at PCAOB, and in private industry is outpacing the supply. According to author Cecily Kellogg, the anticipated growth in the field is expected to be nearly 25 percent over the next ten years. Kellogg goes on to suggest that it is hard to envision a more stable and in-demand career.”²¹

A recent IBISWorld report reports, “Demand for the Forensic Accounting Services Industry, which includes all accounting firms that provide forensic accounting domestically, has surged in recent years, driving the growth of jobs, companies and opportunities within the industry” (Chaing, 2013). The report goes on to state “Accounting Services industry revenue only grew 2.0% annually in the five years to 2013, while revenue for forensic accounting expanded more than four times faster. The tremendous opportunity for accountants in the forensic field is driving expansion...In the five years to 2018, employment numbers among forensic accountancies are projected to continue expanding at an average rate of 9.6% per year, while general accounting services maintain weak growth at 1.9%. This employment growth is due in part to the enticing salaries in the Forensic Accounting Services Industry, averaging more than \$82,000 per year. By contrast, the average salary in the Accounting Services industry is about \$42,000. Forensic accountants typically earn more because their services are more specialized and require a secondary certification.”²²

3. Data showing the current and projected supply of prospective graduates.

See projections in Table 1 below.

E. Reasonableness of program duplication:

- 1. Identify similar programs in the State and/or same geographical area. Discuss similarities and differences between the proposed program and others in the same degree to be awarded.**

¹⁹ <http://www.acfe.com/about-the-acfe.aspx>

²⁰ <http://www2.aaahq.org/fia/index.cfm>

²¹ Krancher, M., Riley, Jr., R. and Wells, J., (2011). *Forensic Accounting and Fraud Examination*, Hoboken, NJ: John Wiley & Sons, Inc.

²² <http://media.ibisworld.com/2013/08/21/accountants-uncover-opportunity-in-forensics/>

In the state of Maryland, there exists only three other programs in forensic accounting at the graduate level.

- University of Baltimore, Baltimore, MD – Master of Science in Forensic Science-High Technology Crime. This is a 30 – hour program focused in cybercrime and is completed on-ground.
- University of Baltimore, Baltimore, MD – Certificate in Forensic Accounting. This is a 12 credit hour program and is completed on-ground.
- Stevenson University – Master of Science in Forensic Studies. This is a 36 – hour program and can be substantially completed online. There are four core courses and various track programs including Accounting, Computer Forensics, Criminalistics, Interdisciplinary, Investigations, or Legal.

Regionally, the following universities offer a Graduate Certificate in Forensic Accounting:

- George Mason University, Fairfax, Virginia (OG)
- Georgetown University, Washington D.C. (OG)
- Fairleigh Dickinson University, Teaneck and Florham, NJ (OG, OL)
- American University, Washington D.C. (OG)

Nationally, the following universities offer a Graduate Certificate in Forensic Accounting:

- West Virginia University, Morgantown, WV (OL)
- LaSalle University, Philadelphia, PA (OL)
- Rider University, Lawrenceville, NJ (OG)
- Baruch College, New York, NY (OG)
- Utica College, Utica, NY (OL)
- Southern New Hampshire University, Manchester, NH (OL)
- Northeastern University, Boston, MA (OL)
- Elms College, Springfield, MA (OG)
- University of North Carolina Charlotte, Charlotte, NC (OL)
- Purdue University (Calumet), Hammond, IN (OG)
- Benedictine University, Lisle, ILL (OG)
- Davenport University, Grand Rapids, MI (OG)
- University of Detroit Mercy, Detroit, MI (OG)
- Missouri State University, Springfield, MS (OG)
- Golden State University, San Francisco, CA (OL, OG)

OG – On-ground

OL – On-line

2. Provide justification for the proposed program.

The MSMU FA GA Program, will be the first online graduate certificate program in Forensic Accounting in the state of Maryland.

Whereby other programs are based in schools of criminal justice or departments, the MSMU FA Program is based in the business school. Forensic accounting is an accounting program, and as such, should be based in the business school and accounting department. The MSMU FA Program is designed to adequately train future accountants and auditors of the future with the knowledge, skills and abilities to help combat fraud and abuse, including financial statement fraud and embezzlement, in order to help protect the profession.

F. Relevance to Historically Black Institutions (HBIs)

- 1. Discuss the program's potential impact on the implementation or maintenance of high-demand programs at HBIs.**
- 2. Discuss the program's potential impact on the uniqueness and institutional identities and missions of HBIs.**

The proposed program does not compete with any offerings of a Historically Black Institution in the region. Any student meeting the admissions requirements could apply to the program. Moreover, the forensic accounting community has identified a need to attract more qualified minorities, and completion of the proposed program would prepare students for careers in Forensic Accounting.

G. If proposing a distance education program, please provide evidence of the Principles of Good Practice (as outlined in COMAR 13B.02.02.22C).

The five graduate courses in the MSMU FA Program will be offered in an online format according to the Principles of Good Practice as outlined in COMAR 13B.02.02.22C. The Bolte School's online courses are designed based on the principles of and in accordance with standards of the Quality Matters Rubric and pedagogically sound best practices for student learning. An online course is defined as a course in which all work is completed online and which provides for a substantive, rich, and engaging experience for learners. This course format provides flexibility for the student with regard to time and place, but still maintains the quality, rigor, and character of a Mount St. Mary's University course.

All courses, whether face-to-face, online, or hybrid, are designed to meet stated learning objectives and ultimately, as part of their overall course of study, allow students to meet or exceed learning objectives for each academic program. Students in online and hybrid courses are expected to invest the same "time on task" and effort as face-to-face courses. Online and hybrid courses require at least the same amount of time, and all courses include student learning assessment to ensure that students are meeting or exceeding intended learning outcomes.

H. Adequacy of faculty resources (as outlined in COMAR 13B.02.03.11)

Provide a brief narrative demonstrating the quality of program faculty. Include a summary list of faculty with appointment type, terminal degree title and field, academic title/rank, status (full-time, part-time, and adjunct) and the course(s) each faculty member will teach.

The proposed program will consist of a diverse faculty, spanning several academic disciplines principally including accounting, but also including business, criminal justice, information systems, and sociology. Additional adjunct forensic accounting faculty will be hired to supplement the current full-time faculty. The proposed Forensic Accounting Program will be directed by Lawrence J. Hoffman, a current full-time Lecturer in Forensic Accounting at MSMU.

Lawrence J. Hoffman, MAcc, CPA, CFF, CGMA, CVA, CFE, CRT, PI (Lecturer in Forensic Accounting and Forensic Accounting Program Director, full-time) – B.S. Accounting, Mount St. Mary's University; MAcc Accounting, Stetson University; Graduate Certificate in Forensic Accounting and Fraud Investigation, Southern New Hampshire University; a Certified Public Accountant (CPA) licensed in the Commonwealth of Virginia; Certified Fraud Examiner (CFE) by the Association of Certified Fraud Examiners; Certified in Financial Forensics (CFF) by the American Institute of Certified Public Accountants (AICPA); a Certified Valuation Analyst (CVA) by the National Association of Certified Valuators and Analysts, Chartered Global Management Accountant (CGMA) designation from the AICPA; Certified in the Reid Technique of Interviews and Interrogations (CRT) by The Reid Institute, and a Private Investigator (PI) licensed by the Virginia Department of Criminal Justice Services.

Other Adjunct Professors:

Leslie C. Kirsch, MS, CFE, CISA, CIDA (Adjunct Professor in Forensic Accounting, part time) – B.S. Accounting, University of Maryland; B.S. Finance, University of Maryland; M.S. Digital Forensics and Cyber Investigations; Certified Fraud Examiner; Certified Information Systems Auditor; Certified IDEA Data Analyst; and SAS Certified Base Programmer for SAS 9.

Sarah Tanno, MA, CPA, CFE (Adjunct Professor in Forensic Accounting, part time) – B.S. Management & History, Tulane University; M.S. Accounting, Tulane University; Certified Public Accountant; and Certified Fraud Examiner.

Lisa Smith Jones, MAcc, CPA (Adjunct Professor in Forensic Accounting, part time) – B.S. Business Administration, California State University; MAcc Accounting, Stetson University; and Certified Public Accountant.

Kari Day, M.S., CPA, FCPA, CFE (Adjunct Professor in Forensic Accounting, part time) – B.S. Business-Accounting, M.S. Accounting, Doctoral student in Advanced Accounting Theory; Certified Public Accountant, Forensic Certified Public Accountant; Certified Global Management Accountant; and Certified Fraud Examiner.

I. Adequacy of library resources (as outlined in COMAR 13B.02.03.12)

Describe the library resources available and/or the measures to be taken to ensure resources are adequate to support the proposed program. If the program is being implemented within

existing institutional resources, include a supportive statement by the President for library resources to meet the program's needs.

The Phillips Library, located on the Emmitsburg campus, is a vibrant learning center where students may read, write, watch, listen, meet, research, learn, and build community. The library operates its Interlibrary Loan (ILL) service for faculty and students through the ILLiad system, which connects to OCLC's 29,000 member libraries. ILLiad provides a convenient way for students and faculty to place requests for books and articles online. Most articles are delivered by email as digital files, while books are sent to the Phillips Library for pick up by the requester. A courier service delivers physical resources once a week to students at the Frederick campus.

The Phillips Library also belongs to the Maryland Independent Colleges and Universities Association (MICUA), which includes the libraries of Hood College, Loyola College, McDaniel and Stevenson University. Mount students have borrowing privileges at these nearby libraries as well as all MICUA libraries.

Direct borrowing from MICUA libraries
Capitol College
Goucher College
Hood College
Loyola University/College of Notre Dame MD
Maryland Institute College of Art
McDaniel College
Mount St. Mary's University
St. John's College
Stevenson University
Washington Adventist University
Washington College

A summary from the OCLC System of the Mount St. Mary's University, The Phillips Library, of volume counts and journal titles in Business is as follows:

	Print Books	Books & e-Books	Business Journals
Business, Business Administration	422	3166	504
Commerce, General	223	1005	161
Economic History & Conditions	1069	3535	702
Economic Theory	751	2971	247
Economics-Industries, Land Use, Labor	921	4841	1071
Economics-Industry, General	205	678	51
Finance, General	344	2268	436
Labor, General	843	2422	130

Public Finance, General	82	375	28
Socialism, Communism, Utopias, Anarchism	543	883	22
Special Industries & Trades, General	267	1935	747
Statistics	62	296	28
Transportation & Communication, General	134	831	123
Writing	44	74	1
TOTAL	5910	25280	4251

Forensic Accounting -Specific Databases

A large number of information students will need in conjunction with the MSMU FA Program is available through open source databases, governmental websites such as the SEC, DOJ, IRS, and others, and a variety of professional organizations such as the AICPA, ACFE, NACVA, and others. Peer reviewed materials in journals are accessible through the university's Phillips Library databases and journals.

J. Adequacy of physical facilities, infrastructure and instructional equipment (as outlined in COMAR 13B.02.03.13)

Provide an assurance that physical facilities, infrastructure and instruction equipment are adequate to initiate the program, particularly as related to spaces for classrooms, staff and faculty offices, and laboratories for studies in the technologies and sciences. If the program is to be implemented within existing resources, include a supportive statement by the President for adequate equipment and facilities to meet the program's needs.

The MSMU FA GC Program will be offered through the Mount St. Mary's University's online learning platform.

All faculty members are provided a University email and use of Moodle, an Open Source Course Management System (CMS). Moodle can be used to host online courses, hybrid courses, or help to supplement face-to-face courses. In addition, faculty also has access to Portal, which is a student information system hosted by the University. Here, faculty can access, among other things, their course lists and information about their advisees. The Portal system is also used to collect course evaluations.

Students and faculty have access to the Center for Instructional Technology (CIT), which is located in the lower level of Knott Academic Center. The CIT is service operated by Mount staff and trained students and provides technical support to students and faculty. They also provide help with networking issues, email issues, audio-visual equipment requests or concerns, and software issues. In addition, they diagnose and repair hardware problems on equipment purchased through the University.

K. Adequacy of financial resources with documentation (as outlined in COMAR 13B.02.03.14)

1. Complete Table 1: Resources and Table 2: Expenditures. Finance data for the first five years of the program implementation are to be entered. Figures should be presented for five years and then totaled by category for each year.

Table 1: Resources					
Resource Categories	2016-17	2017-18	2018-19	2019-20	2020-21
1. Reallocated Funds	-	-	-	-	-
2. Tuition/Fee Revenue (c + g below)	\$73,680	\$151,844	\$192,560	\$246,330	\$272,122
a. Number of F/T students	-	-	-	-	-
b. Annual Tuition, Room, Board Fee/Rate ¹	-	-	-	-	-
c. Total F/T Revenue (a x b)	-	-	-	-	-
d1. Number of GC students	8	10	12	15	15
e1. Credit Hour Rate ¹	\$614	\$638	\$664	\$690	\$718
f1. Annual Credit Hours Per GC Student ²	15	15	15	15	15
d2. Number of MBA students ³	0	4	5	6	7
e2. Credit Hour Rate	\$614	\$638	\$664	\$690	\$718
f2. Annual Credit Hours Per MBA Student	-	22	22	22	22
g. Total P/T Revenue (d1 x e1 x f1 + d2 x e2 x f2)	\$73,680	\$151,844	\$192,560	\$246,330	\$272,122
3. Grants, Contracts, and other External Sources	-	-	-	-	-
4. Other Sources	-	-	-	-	-
TOTAL (Add 1 – 4)	\$73,680	\$151,844	\$192,560	\$246,330	\$272,122

¹Assumes a 4% annual increase from the 2015-2016 MBA credit-hour rate.

²Assumes that all students complete the 15-credit graduate certificate program in their first year of study.

³Assumes that half of the students continue in their second year to take the 22 credits required to complete an MBA.

Table 2: Expenditures					
Expenditures Categories	2016-17	2017-18	2018-19	2019-20	2020-21
1. Faculty (b + c + d below) ¹	\$17,000	\$17,000	\$17,000	\$17,000	\$17,000
a. # FTE	0	0	0	0	0
b. Total Salary	\$0	\$0	\$0	\$0	\$0
c. Total Benefits	\$0	\$0	\$0	\$0	\$0
d. Part-Time Faculty Stipends ²	\$17,000	\$17,000	\$17,000	\$17,000	\$17,000
2. Admin Staff (b + c + d below) ³	\$0	\$0	\$0	\$0	\$0
a. # FTE	-	-	-	-	-
b. Total Salary	-	-	-	-	-
c. Total Benefits	-	-	-	-	-
d. Course release	-	-	-	-	-
3. Support Staff (b + c below)	-	-	-	-	-
a. # FTE	-	-	-	-	-
b. Total Salary	-	-	-	-	-
c. Total Benefits	-	-	-	-	-
4. Equipment	-	-	-	-	-
5. Library	-	-	-	-	-
6. New or Renovated Space	-	-	-	-	-
7. Other Expenses ⁴	\$17,000	-	-	-	-
TOTAL (Add 1 – 7)	\$34,000	\$17,000	\$17,000	\$17,000	\$17,000

¹No new full-time faculty position will be needed for this program.

²All courses in the GC program will be taught as overloads for full-time faculty or using part-time adjunct faculty. The overload/adjunct stipend is \$3,400 per course. It is assumed that no new MBA course sections will be added to support the additional MBA course demand – these students will be added to existing classes.

³Program will be administered by existing staff.

⁴A course development stipend of \$3,400 will be offered to each of the five initial online course designers for the certificate program.

2. Provide a narrative rationale for each of the resource category. If resources have been or will be reallocated to support the proposed program, briefly discuss the sources of those funds.

The revenues in Table 1 come entirely from the expected part-time tuition generated from new students who will attend Mount t. Mary's University because of this proposed program.

The expenses in Table 1 come from an initial course development stipend and then ongoing overload/part-time adjunct faculty stipends.

L. Adequacy of provisions for evaluation of program (as outlined in COMAR 13B.02.03.15).

Discuss procedures for evaluating courses, faculty and student leaving outcomes.

The Bolte School employs various tools and mechanisms for evaluating programs including current courses, faculty and student leaving outcomes. First, courses are review to ensure they are meeting university, Bolte School and applicable academic degree and major objectives and standards. Assessment tools, such as pre-determined in-class assignments, ETS Exams, and student evaluations, are all taken into consideration when examining a particular course. Appropriate adjustments are made as data from these tools and processes are evaluated.

Faculty are evaluated on an on-going basis by reviewing syllabi prior to commencement of classes, conducting classroom observations, and examining student evaluations.

Student learning outcomes are assessed by a variety of factors including professor informal meetings and interviews with students throughout the semester, ETS Exams, pre-determined course assignments, senior exit surveys, and alumni surveys.

M. Consistency with the State's minority student achievement goals (as outlined in COMAR 13B.02.03.05 and in the State Plan for Postsecondary Education).

Discuss how the proposed program addresses minority student access & success, and the institution's cultural diversity goals and initiatives.

The MSMU FA GC Program is committed to minority student achievement and the State's goals as stipulated in COMAR 13B.02.03.05. In addition, MSMU welcomes students from all background and cultures as stated in the university policies on equal opportunity, nondiscrimination, and student diversity as follows:

Equal Opportunity Statement

The University does not discriminate on the basis of race, color, national origin, age, religion, sex, genetic information, or disability in admission and access to, or treatment in employment, educational programs or activities as required by Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act, the Americans with Disabilities Act of 1990 and their implementing regulations. Questions or complaints may be directed to the Director of Human Resources.

Non-Discrimination Policy

Mount Saint Mary's University and Seminary prohibits discrimination on the basis of race, color, national or ethnic origin, political or religious opinion or affiliation, marital status, age, sex or disability in the recruitment or admission of students, against any employee or applicant for employment, or in the administration of the University's educational policies, admission policies, scholarship and athletic programs, employment policies, (except when sex, age or religion constitutes a bonafide occupational qualification), and other University administered activities and programs.

Center for Student Diversity

The Center for Student Diversity was established to aid Mount St. Mary's University in its efforts of fostering inclusion, collaboration, and relationship building across campus. The Center provides academic, social, and transitional support in addition to programming, leadership training and inclusive workshops for ALL students and promotes exchange and dialogue between individuals of diverse backgrounds.

The Center for Student Diversity oversees the intercultural development, the Horning Fellowship, student support programs (including Third Century Scholars program and the American Indian program), and cultural programs. The office also supports cultural organizations, conducts diversity awareness programs, assesses the needs and climate of diverse groups and advocates on behalf of underrepresented students.

The Guiding Principles

- We serve all students, while paying particular attention to the needs of under-represented and marginalized groups on campus.
- We assist the institution recruit, retain, and graduate a diverse student body.
- We provide a welcoming, inclusive and supportive environment where all student can attain educational pursuits.

N. Relationship to low productivity programs identified by the Commission:

If the proposed program is directly related to an identified low productivity program, discuss how the fiscal resources (including faculty, administration, library resources and general operating expenses) may be redistributed to this program.

The MSMU FA GC Program has not been identified by the Commission as a low productivity program and therefore this section is not applicable to this application.