

# **MARYLAND HIGHER EDUCATION COMMISSION**

## **MEETING BOOKLET**

Time: 10:00 AM  
Wednesday, August 28, 2024

Place: Maryland Higher Education Commission  
Nancy S. Grasmick Education Building  
7th Floor Boardroom

## **Maryland Higher Education Commission**

Catherine J. “Cassie” Motz, Chair

Chike Aguh, Vice Chair

Kathleen Bands, Ph.D.

Mickey L. Burnim, Ph.D.

Charlene Mickens Dukes, Ed.D.

Barbara Kerr Howe

Ray Serrano, Ph.D.

Rebecca Taber Staehelin

Sheila D. Thompson, Ph.D.

Craig A. Williams, Ph.D.

Janet E. Wormack, Ed.D.

Praise Alayode, Student Commissioner

**Sanjay Rai, Ph.D.**

**Secretary**

**Wes Moore**  
**Governor**

**Aruna Miller**  
**Lt. Governor**



**Wes Moore**  
Governor

**Aruna Miller**  
Lt. Governor

**Cassie Motz**  
Chair

**Sanjay Rai, Ph.D.**  
Secretary

## **Maryland Higher Education Commission Meeting Agenda**

**TIME:** 10:00 a.m.  
Wednesday  
August 28, 2024

**PLACE:** 7<sup>th</sup> Floor Boardroom  
Nancy S. Grasmick State Education Bldg.  
200 West Baltimore Street  
Baltimore, Maryland 21201

	<b>Page</b>	<b>Action Item</b>
<b>Call to Order</b>		
<b>Chair's and Secretary's Remarks</b>		
<b>Public Comments</b>		
<b>Commission Meeting Minutes Approval.....</b>	<b>1</b>	<b>*</b>
• May 22, 2024		
• June 26, 2024		
<b>Department of Academic Affairs – Dr. Emily Dow</b>		
• FY 2024 Biannual Report on VA Education Benefits: MD SAA Actions for October 1, 2023 – March 31, 2024 – Ms. Trish Gordon McCown and Mr. Everett Jackson.....	10	
• Biannual Report on Private Career Schools: Actions for January 1, 2024 – June 30, 2024 – Ms. Trish Gordon McCown and Mrs. Donita Moore.....	14	
• Report on Institutions of Higher Education Institution Review: Secretary Actions for January 1, 2024 – June 30, 2024 – Ms. Trish Gordon McCown and Dr. Alix Chaillou.....	23	
• Report on Institutions of Higher Education Program Review: Secretary Actions for January 1, 2024 – June 30, 2024 – Ms. Trish Gordon McCown and Dr. Lyndsay Silva.....	32	
• Proposed Regulatory Amendments – COMAR 13B.02.03: Academic Program Review – Standards for Substantial Modification – Dr. Emily Dow.....	50	<b>*</b>
• Draft Appendix on Statewide Needs Analysis for Commissioner Review – Dr. Emily Dow.....	58	
• Preview of Unreasonable Duplication Definition – Dr. Emily Dow.....	61	

- General Updates from Academic Affairs – Dr. Emily Dow
  - Blueprint Implementation Plan
  - Post-2025 Completion Goals
  - Aspen Transfer Initiative
  - Student Success Summit

## **Adjournment**

*\*The next Commission meeting will be on Wednesday, September 18, 2024 @ 10 a.m. – 4 p.m.*

**Maryland Higher Education Commission**  
Meeting Minutes

May 22, 2024  
10:00 a.m.

The Maryland Higher Education Commission (MHEC) met on Wednesday, May 22, 2024 in the 7<sup>th</sup> floor boardroom in the Nancy S. Grasmick State Education Building (200 West Baltimore Street, Baltimore, MD 21201). The meeting was also livestreamed (and recorded), and some Commissioners joined virtually.

**Commission members present:**

Catherine J. “Cassie” Motz, Chair	Ray Serrano, Ph.D.
Chike Aguh, Vice Chair	Sheila D. Thompson, Ph.D.
Kathleen Bands, Ph.D.	Craig A. Williams, Ph.D.
Mickey L. Burnim, Ph.D.	Janet E. Wormack, Ed.D.
Barbara Kerr Howe	Cierra M. Robinson, Student Commissioner (joined at 10:15 a.m.)

**Commission members absent:**

Charlene Mickens Dukes, Ed.D.	Rebecca Taber Staehelin
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**Staff members present:**

Sanjay Rai, Ph.D.	Emily A. A. Dow, Ph.D.
Anthony Reiner	Soma Kedia
Geoffrey Newman	Kimberly Smith Ward
Derrick Coley	Deborah Ing
Yuxin Lin, Ph.D.	Barbara Schmertz, Ph.D.
Al Dorsett	Daniel Schuster

**Call to Order**

The meeting was called to order by **Chair Motz** at approximately 10:02 a.m. A meeting quorum was established with ten (10) out of twelve (12) members present.

**Chair’s Remarks**

**Chair Motz** thanked everyone for attending today’s meeting and welcomed new Commissioner, Dr. Kathleen Bands, who spent most of her professional career at Hood College. **Commissioner Bands** thanked everyone for the warm welcome and remarked that her service on the Commission was a way for her to continue her work in higher education in retirement.

**Vice Chair Aguh** shared that, in his conversations with various local business groups, many have agreed to distribute our public survey widely regarding the new completion goals. Additionally, he will be chairing the Education Policy Committee. Other members include Commissioners Dukes, Taber Staehelin, Williams, and Serrano.

**Chair Motz** added that she has been in conversation with the Governor's Office regarding their participation in our fall Student Success Summit. Joining her on the planning committee will be Commissioners Dukes, Serrano, Thompson, and Wormack.

### **Secretary's Remarks**

**Secretary Rai** welcomed Dr. Bands to the Commission and gave an overview of the agenda. He also reported that, in a six-week period (April 1 – May 15), MHEC approved 21 academic programs.

### **Public Comments**

There were no public comments.

### **Commission Minutes Approval**

**Commissioner Howe** made a motion to approve the minutes from the January 24, 2024 meeting (with closed session summary), and **Commissioner Burnim** seconded the motion. The motion was approved unanimously.

### **Department of Finance and Administration – Office of Student Financial Assistance – Scholarship Awarding Updates – Information Item**

**Chair Motz** recognized Mr. Geoffrey Newman, Assistant Secretary for Finance and Administration, who asked Mr. Al Dorsett, Director of the Office of Student Financial Assistance, to present this item. Mr. Dorsett shared an update on how his team is handling challenges resulting from the new FAFSA form. He also provided an update on scholarship awarding. The system was shut down temporarily to external users for the purpose of system enhancements and maintenance. Applicants are also awarded during this time. Mr. Dorsett reported as well on the status of the Request for Proposal (RFP) for a new MDCAPS (Maryland College Aid Processing System), used by both students and institutions. Seven (7) proposals have been received at this time. The Commissioners asked questions about Mr. Dorsett's presentation, and **Chair Motz** requested another update next month.

### **Department of External Relations – Updates on FAFSA Outreach/Communications – Information Item**

**Chair Motz** recognized Mr. Derrick Coley, Executive Director of External Relations, to present this item. Mr. Coley reported that Maryland is currently ranked 18<sup>th</sup> out of all states for FAFSA completion and has a 37 percent FAFSA completion rate for 2024-2025. Last year (2023-2024), it was ranked 24<sup>th</sup> with a 57 percent completion rate. MHEC has collaborated with MSDE

(Maryland State Department of Education) and USDE (U. S. Department of Education) to encourage FAFSA completion. Additionally, MHEC hosted FAFSA Town Hall meetings with various stakeholder groups to keep them informed of the agency's efforts to assist students and families during this challenging time. MHEC has also participated in many outreach events and is active on various social media outlets.

**Department of Academic Affairs – Office of Research and Policy Analysis – Maryland Higher Education Commission Maryland Public Colleges and Universities Enrollment Projections 2024 to 2033 – Action Item**

**Chair Motz** recognized Dr. Emily Dow, Assistant Secretary for Academic Affairs, who asked Dr. Barbara Schmertz, Director of the Office of Research and Policy Analysis, and Dr. Yuxin Lin, Associate Director of the Office of Research and Policy Analysis, to present this item. The Maryland Higher Education Commission (MHEC) has prepared enrollment projections for Maryland public colleges and universities through Fall 2033. The projections include headcount projections for each institution, with separate analyses for full- and part-time undergraduates and, as applicable, full- and part-time graduate/professional students. Full-time equivalent (FTE) and full-time day equivalent (FTDE) projections were calculated by applying a mathematical formula to the headcount figures. Projections have also been developed for state-funding-eligible FTE noncredit continuing education enrollments at the community colleges.

These 10-year enrollment projections are produced to fulfill a regulatory charge (13B.07.04.01):

*B. The Commission shall establish annually:*

*(2) **Enrollment projections to be used by the college to prepare capital construction projects.***

*C. For purposes of determining the statutory limit on State financial participation in the college capital construction projects, **the proposed capacity of the college in number of students shall be the approved projected 10-year full-time equivalent enrollment as adopted by the Commission.***

The projections model aims to answer the question “How many Marylanders may be enrolled in postsecondary education in ten years?” These projections reflect the *potential* enrollment in Maryland – the number of students Maryland public institutions need to educate in the next ten years – disaggregated by segment, institution, and specific subpopulations.

These projections provide perspective to higher education policy discussions at the state level, including facilities planning, tuition and fees issues, articulation, and funding priorities. The Department of Budget and Management and the General Assembly may use the Commission's forecasts for the State's official enrollment projections.

The Commission used separate but similar methodologies for projecting credit enrollments and FTE/FTDE at the community colleges and public four-year institutions. A third method was applied to produce the projections of noncredit continuing education enrollments at the

community colleges. The projections involve the application of regression models based on a series of assumptions on the factors that may have an impact on enrollment.

For FY 2024, MHEC enrollment projections forecast that the statewide potential credit enrollment will rise to 334,766 by Fall 2033, a 19.2% increase over 10 years. Public four-year institutions will experience a 13.3% increase in undergraduate enrollment and a 32% increase in graduate enrollment, and community colleges are estimated to observe a 22.4% increase in the next 10 years. The Commissioners asked questions about the presentation. **Chair Motz** expressed concern regarding the use of the current model and the inaccuracy of the enrollment projection numbers for community colleges.

Dr. Lin recommended that the Maryland Higher Education Commission accept the 2024-2033 enrollment projections and approve their distribution to the public, the campuses, and interested state agencies. **Commissioner Burnim** made a motion, and **Commissioner Wormack** seconded the motion. The motion was approved unanimously.

### **Moore-Miller Plan – Updates on MHEC Initiatives – Information Item**

**Chair Motz** recognized Dr. Dow and Mr. Newman to present this item. **Secretary Rai** gave an overview, noting that the Moore-Miller Administration 2024 State Plan has ten (10) priorities, two (2) of which relate to MHEC's work. The #2 priority is "Setting Maryland's Students Up for Success" and the #4 priority is "Connecting Marylanders to Jobs." We share the second priority with MSDE and the fourth priority with the state Department of Labor.

Dr. Dow remarked that in the second priority, MHEC has two main areas of responsibility: college and career readiness (CCR) and teacher preparation programs. These already align well with the Blueprint for Maryland's Future. Mr. Newman reported that, related to the fourth priority, the agency will take a second look at the eligible fields for the Workforce Shortage Student Assistance Grant Program. Additionally, MHEC is convening the Advisory Council on Workforce Shortage.

### **Other Business**

The Commissioners discussed the possibility of appointing members to the Finance and Operations Committee. After some discussion, it was decided that the committee will not be filled and convened at this time. Rather, topics of interest related to finance and agency operations can be addressed during monthly Commission meetings.

### **Adjournment**

**Vice Chair Aguh** made a motion to adjourn the meeting, and **Commissioner Thompson** seconded the motion. The motion passed unanimously. The meeting adjourned at approximately 12:33 PM.



Approved by the Commission:

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Catherine J. “Cassie” Motz, Chair

**Maryland Higher Education Commission**  
Meeting Minutes

June 26, 2024  
10:00 a.m.

The Maryland Higher Education Commission (MHEC) met virtually via Google Meet on Wednesday, June 26, 2024 at 10:00 a.m.

**Commission members present:**

Catherine J. “Cassie” Motz, Chair	Rebecca Taber Staehelin
Chike Aguh, Vice Chair	Sheila D. Thompson, Ph.D.
Kathleen Bands, Ph.D.	Craig A. Williams, Ph.D.
Mickey L. Burnim, Ph.D.	Janet E. Wormack, Ed.D.
Barbara Kerr Howe	Cierra M. Robinson, Student Commissioner

**Commission members absent:**

Charlene Mickens Dukes, Ed.D.	Ray Serrano, Ph.D.
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**Staff members present:**

Sanjay Rai, Ph.D.	Emily A. A. Dow, Ph.D.
Lyndsay Silva, D.P.A.	Soma Kedia
Geoffrey Newman	Kimberly Smith Ward
Derrick Coley	Deborah Ing
Glenda Abney	Trish Gordon McCown
Al Dorsett	Alexis Merriman
Alexandra Chaillou, Ph.D.	Brittany Martin
Alexia Simmons	Bryson Barksdale
Alexandra Edelstein	Melissa Leuschel
Victoria Johnson	Cara Martinez
Samuel Durai Pandian	Ebony Walters
Shayla Hunter	Frances Turner
Rose Robinson	

**Call to Order**

The meeting was called to order by **Vice Chair Aguh** at approximately 10:01 a.m. A meeting quorum was established with ten (10) out of twelve (12) members present.

**Vice Chair’s Remarks**

**Vice Chair Aguh** welcomed everyone and remarked that he was chairing today's meeting on behalf of Chair Cassie Motz. He thanked the Office of Student Financial Assistance for their efforts to assist students and families amidst the FAFSA-related challenges experienced by all at this time. **Vice Chair Aguh** also thanked the work of other groups in the state to promote FAFSA completion. He reported that the Education Policy Committee held its first meeting recently, and he thanked the Commissioners who volunteered to serve on it.

### **Secretary's Remarks**

**Secretary Rai** thanked the Student Commissioner, Ms. Cierra Robinson, on the occasion of her last Commission meeting. Student Commissioners serve only for a year from July 1 to June 30, and Commissioner Robinson will be missed for her valuable input and unique student perspective. MHEC wishes her the best in all of her future endeavors. **Secretary Rai** then gave an overview of the agenda, noting that there were many exciting updates to report.

### **Public Comments**

There were no public comments.

### **Commission Minutes Approval**

**Commissioner Howe** made a motion to approve the minutes from the February 28, 2024 and March 20, 2024 meetings, and **Commissioner Taber Staehelin** seconded the motion. The motion was approved unanimously.

### **Student Advisory Council 2023-24 Annual Report – Information Item**

**Vice Chair Aguh** recognized Dr. Emily Dow, Assistant Secretary for Academic Affairs, who asked Ms. Alexis Faison, Chair of the Student Advisory Council, to present this item. Ms. Faison gave an overview of the discussion topics at meetings over the course of the previous academic year. Their accomplishments and recommendations included those related to voting and civic engagement, repercussions of the pandemic (medical & health, economic, academic, and social considerations), food insecurity, supporting non-native, English-speaking students, and incarcerated individuals. The annual report presented to the Commission also lists planning suggestions for next year for the incoming Student Advisory Council.

### **Faculty Advisory Council 2023-24 Annual Report – Information Item**

**Vice Chair Aguh** recognized Dr. Dow who asked Dr. Raenita Fenner, incoming Chair of the Faculty Advisory Council, to present this item. Dr. Fenner gave an overview of the discussion topics at meetings over the course of the previous academic year. Their accomplishments and recommendations included those related to active assailant & campus safety, artificial intelligence (AI), use of student course evaluations (to assess teaching performance), faculty requirement for academic programs, course equivalency guidance, and time spent by students outside the classroom.

### **Department of Finance and Administration – Financial Aid Updates – Information Item**

**Vice Chair Aguh** recognized Mr. Geoffrey Newman, Assistant Secretary for Finance and Administration, who gave some background on the present challenges experienced with the new FAFSA form. Problems began with a late launch of the form (late December, rather than October 1) and continued with the delayed delivery of the first batch of student records from the U. S. Department of Education. MHEC responded by offering trainings to financial aid professionals and town hall meetings for various stakeholder groups. Additionally, MHEC extended the filing deadline from May 1 to June 1. Mr. Al Dorsett, Director of the Office of Student Financial Assistance, reported that, to date, 11,467 students have been awarded, and MHEC is close to selecting a vendor to develop a new student financial aid processing system.

### **Department of External Relations – FAFSA Outreach Grant – Information Item**

**Vice Chair Aguh** recognized Mr. Derrick Coley, Executive Director of External Relations, to present this item. Mr. Coley reported that MHEC applied for and received a grant in the amount of \$500,000 from the Educational Credit Management Corporation (ECMC), a nonprofit company that provides support for the administration of the Federal Family Education Loan Program. ECMC was designated as the lead organization for the U. S. Department of Education’s Federal Student Aid Office to support efforts to increase completion of FAFSA applications. The purpose of the award is to increase 2024-25 FAFSA completion rates, combat “summer melt” and increase actual college enrollment rates. (Maryland is currently 24<sup>th</sup> of all states for FAFSA completion with a 42% student completion rate.) However, the money must be spent by August 31. (The final federal deadline is September 14.) MHEC will be targeting in their outreach those school districts where the completion rate is one of the lowest and pairing them with community colleges.

### **Department of Academic Affairs – Implementation of HB 1244 – Information Item**

**Vice Chair Aguh** recognized Dr. Dow to present this item. [House Bill 1244](#) (Maryland Higher Education Commission – Academic Program Approval and Institutional Mission Statements – Requirements) takes effect on July 1, 2024. Initiatives that require changes include:

- 1) Statewide workforce need and emerging field analysis;
- 2) Revisions to definition of substantial modification;
- 3) Standards for analysis for unreasonable duplication and unnecessary duplication;
- 4) Mission statement review for public institutions;
- 5) Establish a Program Review Process Advisory Committee;
- 6) Develop process for fully online programs;
- 7) Letters of intent for new graduate programs;
- 8) Conduct harm analysis; and
- 9) Create an administrative procedures guide.

### **Proposed Topics for Upcoming Commission Meetings – Information Item**

**Vice Chair Aguh** recognized Dr. Dow to present this item. During the July Commission meeting, topics that will be covered include an update on the development of post-2025

completion goals, an update on substantial modification changes, and an update on the Program Review Process Advisory Committee. The August Commission meeting will include a presentation of the proposed appendix on statewide needs analysis, an update on substantial modification changes, an update on mission statement review criteria, and 6-month reports from the Academic Affairs department. The September Commission meeting will include, as usual, budget presentations from the higher education segments, as well as an update on mission statement review criteria, and regulations for initial approval for publication and public comment (substantial modification, unreasonable duplication analysis, unnecessary duplication analysis, and letters of intent format and process). **Vice Chair Aguh** requested that all meeting materials be shared with Commissioners as far in advance of the meeting as possible.

### **Adjournment**

**Commissioner Taber Staehelin** made a motion to adjourn the meeting, and **Chair Motz** seconded the motion. The motion passed unanimously. The meeting adjourned at approximately 12:03 PM.

Approved by the Commission:

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Catherine J. “Cassie” Motz, Chair



**Wes Moore**  
Governor

**Aruna Miller**  
Lt. Governor

**Cassie Motz**  
Chair

**Sanjay Rai, Ph.D.**  
Secretary

## MEMORANDUM

**DATE:** August 28, 2024

**TO:** Commissioners, Maryland Higher Education Commission

**FROM:** Trish Gordon McCown, Director of Academic Affairs

**STAFF:** Everett Jackson, Jr., Associate Director, Veterans Affairs/State Approving Agency  
Olayta Rigsby, Veterans Affairs Analyst  
Wayne Holmes, Veterans Affairs Analyst

**SUBJECT:** FY 2024 Biannual Report on VA Education Benefits: MD SAA Actions for October 1, 2023 – March 31, 2024

During this reporting period, the Maryland State Approving Agency (MD SAA) <sup>1</sup> for Veterans Education and Training Benefits acted on **2,659** program related actions. The program activities listed below are related to institutions and training facilities approved to participate in the Veterans Education and Training programs administered by the U.S. Department of Veterans Affairs (VA). The actions listed below are dictated by federal law and regulations.

State Approving Agency Program Related Activities	Number of Actions
Program Actions	1,419
Other Actions	952
Risk Based Surveys	2
Supervisory Visits	12
Inspection Visits	2
Technical Assistance	264
Outreach	0
Liaison	8
<b>Total Actions</b>	<b>2,659</b>

<sup>1</sup> MHEC serves as the Maryland State Approving Agency for Veterans Education and Training programs administered by the U.S. Department of Veterans Affairs. The statutory authority for State Approving Agencies is granted in accordance with Chapter 36 of Title 38 United States Code ([36 U.S.C. §3671](#)). This report was calculated following the Federal fiscal year.

**Section I. Program Actions-** Initial and revised program approval (Certificate, Diploma or Degree).

Type of Facility	IHL	NCD	APP	OJT	LACAS	FLT	PREP
Number Approved	1321	34	4	0	3	18	1
Number Disapproved	34	0	4	0	0	0	0

**Section II. Other Actions-** Those actions taken to assess: (a) program and policy information contained in facilities’ publications; (b) contents of a supplement or an addendum to facilities’ publications; (c) revision to a policy or a practice; or (d) any actions that substantiate the continuation of an existing approval.

Type of Facility	IHL	NCD	APP	OJT	LACAS	PREP	FLT
Number Approved	635	152	20	0	5	4	136
Number Disapproved	0	0	0	0	0	0	0

**Section III. Visits to Facilities – See Appendix A for list of facilities.**

	IHL	NCD	APP	OJT	LACAS	PREP	FLT
Risk Based Survey Visits (1)	2	0	0	0	0	0	
Supervisory Visits (2)	8	4	0	0	0	0	0
Inspection Visits (3)	0	2	0	0	0	0	0
DVA Requested Visits (4)	0	0	0	0	0	0	
Other Visits (5)	0	0	0	0	0	0	0

1. A visit to a previously approved facility to monitor and assure continued acceptability of approval triggered by an indicator tracked by VA data.
2. A visit to a previously approved facility to monitor and assure continued acceptability of approval.
3. A visit to a new facility requesting approval or to an approved facility requesting approval of a new program.
4. Visits made at the request of the VA.
5. Visits made at the request of a facility for assistance, Licensure/Certification Test visits; etc.

**Section IV. Technical Assistance-** Technical assistance is any interaction designed to assist an individual, a school, or training site personnel with any portion of the approval function. Assistance could be rendered either before or after initial approval.

Type of Facility	IHL	NCD	APP	OJT	PREP	FLT	LACAS
Number of Technical Assistant Actions	144	52	18	0	20	26	4

## Section V. Other Activities of Visits

Outreach Activities (1)	Liaison Activities (2)
0	8

1. Outreach is defined as any activity designed to inform or encourage those with GI Bill entitlement to use it, and any activity that encourages potential providers to become approved and to recruit users of the GI Bill.
2. Liaison is defined as activities that equate the SAA with other education and training professionals, promote and encourage exchange of information and support, and integrate the SAA into associations that will serve the interest of the program.

## Definitions

1. APP- Apprenticeship Program
2. CORR- Correspondence courses (i.e. by mail or electronic transmission)
3. FLT- Flight facilities
4. IHL- Institution of Higher Learning (i.e. colleges and universities)
5. LACAS- License and Certification (i.e. bar exam, cosmetology board exam)
6. NCD- Non-college degree facility (i.e. private career school)
7. OJT- On-the-job training program
8. SCO- School Certifying Official, the VA point of contact for an approved educational training institute.



### **Appendix A**

<b>Risk Based Survey Visits</b>
University of Maryland Global Campus
St. Johns College
<b>Supervisory Visits</b>
Hair Expressions Academy
Goucher College
Academy of Professional Barbers
Howard Community College
Hood College
Bowie State University
Maritime Institute of Technology
Maryland Institute College of Art
Capitol Technology University
Washington Adventist University
Prince George’s Community College
Fortis Institute-Towson
<b>Inspection Visits (for new VA facility approvals)</b>
Shawntay’s School of Creative Nails-South
Top Curl Beauty Academy
<b>New Facility Approvals</b>
Carter Machinery Company, Inc. (Apprenticeship)
Southern High School (Non-college degree)
The National Board of Examiners in Optometry (License and Certification Exam)
Top Curl Beauty Academy (Non-college degree)
Meade High School (Non-college degree)



**Wes Moore**  
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**Cassie Motz**  
Chair

**Sanjay Rai, Ph.D.**  
Secretary

## MEMORANDUM

**DATE:** August 28, 2024

**TO:** Commissioners, Maryland Higher Education Commission

**FROM:** Trish Gordon McCown, Director of Academic Affairs

**STAFF:** Donita Moore, Interim Associate Director, Career & Workforce Education  
Desiree Rodriguez, Education Analyst, Career & Workforce Education  
Briana Hines, Education Analyst, Career & Workforce Education  
Jodie Fair, Administrative Officer II, Career & Workforce Education

**SUBJECT:** Biannual Report on Private Career Schools: Actions - January 1, 2024 – June 31, 2024

During the current reporting period, the agency acted on a total of **86 non-degree academic program proposals** requiring review under Code of Maryland Regulations (COMAR) 13B.01.01, and they are outlined immediately below.

Private Career School Activities	Number of Actions
New Schools	5
New Programs	5
Approval of Changes of Location	2
Approval of Name Changes	1
Approval of Change of Ownership	4
Approval of Change of Director	1
Approval of Separate Classrooms	0
Other Business Approvals	1
Certificate Renewals	7
Cease and Desist Orders	0
Notices of Deficiencies	0
School Approvals Withdrawn	0
Program Approvals Withdrawn	0
Training Provider Questionnaires	60
<b>Total Actions</b>	<b>86</b>

## I. APPROVAL OF NEW SCHOOLS – 5

Institution Name	Address	Approval Date	Programs
Maryland Academy of Montessori Education	4465 Montgomery Road Ellicott City, MD 21043	1/9/2024	Early Childhood Montessori Education
Utilittrain, LLC	200 Patriotic Lane Elkton, MD 21921	3/12/2024	Electrical Line Worker(ELP) ELP with CDL Commercial Drivers Licensure
MIAA Beauty Institute	7744 Marlboro Pike District Heights, MD 20747	4/8/2024	Cosmetology Esthetician, Nail Technology
Top Knowledge Healthcare Institute-Montgomery	11821 Parklawn Drive Suite 320 Rockville, MD 20852	5/31/2024	Clinical Dental Assistant Clinical Medical Assistant Dental Assistant 600 Medical Assistant Phlebotomy
I.T. Phlebotomy Solutions, LLC	218 East Lexington Street Suite 701 Baltimore, MD 21202	6/11/2024	Phlebotomy Entry Level

## II. NEW PROGRAMS REVIEWED AND APPROVED – 5

Institution Name	Address	Approval Date	Program
Empire Beauty School	9616 Reisterstown Road Suite 105 Owings Mills, MD 21117	2/7/2024	Cosmetology
Empire Beauty School	6320 Ritchie Highway Glen Burnie, MD 21061	2/7/2024	Cosmetology
The Temple: A Paul Mitchell Partner School	2303 Forest Drive Suite C Annapolis, MD 21401	4/8/2024	Basic Barbering Hair Stylist Nail Technician
The Temple: A Paul Mitchell Partner School	22 West Church Street Frederick, MD 21701	4/8/2024	Basic Barbering Hair Stylist Nail Technician
Baltimore Beauty & Barber School II	29 Greenmeadow Drive Timonium, MD 21093	5/20/2024	Esthetics

### III. APPROVAL OF CHANGE OF LOCATION – 2

Institution Name	Approval Date	Former Address	Current Address
North American Trade Schools	5/1/2024	6901 Security Square Boulevard Suite 12 Baltimore, MD. 21244	5760 Wabash Avenue Baltimore, MD 21215
Top Knowledge	6/21/2024	11 East Mount Royal Ave Suite 001 Baltimore, MD 21202	11821 Parklawn Drive Suite 320 Rockville, MD 20852

### IV. APPROVAL OF NAME CHANGES – 1

Institution Name	Approval Date	Former Name
Fernanda's Beauty Institute (FBI)	5/13/2024	Fernanda's Beauty Bar

### V. APPROVAL OF CHANGE OF OWNERSHIP – 4

Institution Name	Address	Approval Date	Rationale for Change
Maryland Real Estate Academy	1424 Sulphur Spring Road Arbutus, MD 21227	6/3/2024	Purchased by New Owners
Empire Beauty Schools	9616 Reisterstown Road Suite 105 Owings Mills, MD 21117	4/17/2024	Transfer of Shares
EL Academy, LLC d/b/a Elite Learning Academy	231 Najoles Road Suite 100 Millersville, MD 21108	4/17/2024	Purchased by New Owners
Empire Beauty Schools	6320 Ritchie Highway Suite F Glen Burnie, MD 21061	4/17/2024	Transfer of Shares

### VI. APPROVAL OF CHANGE OF DIRECTOR – 1

Institution Name	Former Director	New Director
Tristar Academy Inc.	Chris Sinanan	Sarah Sinanan

**VII. APPROVAL OF SEPARATE CLASSROOMS -0**

**VIII. “OTHER BUSINESS” – 1**

Institution Name	Other Business	Effective Date
Cambridge-Gaithersburg	CPR and First-Aid	1/20/2024

**IX. CERTIFICATE RENEWALS – 7**

Institution Name	Renewal Date	Certificate Number
Cambridge -Gaithersburg	2/2/2024	1886
AMC Career Institute	2/22/2024	1906
Pittsburgh Institute of Aeronautics, Inc	2/22/2024	1907
Cambridge - Hyattsville	4/1/2024	1903
International Cosmetology Inc. d/b/a Aveda Institute Maryland)	6/17/2024	1867
Avara's Academy of Hair Design	6/17/2024	1694
Top Knowledge	5/31/2024	2064

**X. CEASE AND DESIST ORDERS – 0**

**XI. NOTICE OF DEFICIENCIES – 0**

**XII. SCHOOL APPROVALS WITHDRAWN – 0**

**XIII. PROGRAM APPROVALS WITHDRAWN – 0**

**XIV. TRAINING PROVIDER QUESTIONNAIRES – 60**

<b>Not-Exempt (Secretary Approval Required)</b>		
<b>Proposed Institution Name</b>	<b>Programs</b>	<b>Final Action Letter</b>
Cecilia's Beauty Academy, LLC	Cosmetology/ Nail Technician	3/28/2024
Black Wall Street Charm City d/b/a BWSCC Career Academy)	Cybersecurity Systems - CYSA+; Cloud Systems - AWS; Network Administration - Cisco CCNA; Linux Administration - Linux +; Systems Administration - Security +	3/7/2024
Fanaka Institute of Real Estate	Real Estate	3/15/2024
Training Grounds, Inc	Data Cabling Installer Program	2/16/2024
National Technology Institute	Plumbing; HVAC; Electrician	2/27/2024
Good Hope Health Institute	CNA/GNA training	2/15/2024
Tight N Up Barber d/b/a 'Up Next Barber'	Barbering	5/16/2024
DriveSafe CDL Academy	CDL Training	2/15/2024
MJB Holistic Hair Academy	Natural/Texture Hair Stylist	5/21/2024
DR Broadie Transportation	Commercial Driver's Licensing Class A & B	2/15/2024
Blackstone Healthcare Solutions, LLC	Certified Professional Coder; Certified Professional Biller; Certified Professional Medical Auditor	3/26/2024
Medical Health Tech Academy	Online Medical Billing/Coding Specialist	2/14/2024
CocoTea Beauty Academy	Makeup, Hairstyling, Nails, and Esthetics	1/31/2024
Patroot Academy	CNA/GNA	5/22/2024
Grace Nails Art Academy	Nail Technician Licensing Program	1/23/2024
Open Works	Baltimore Sewn Trades Training Program	4/3/2024
All Veins Accessible	Phlebotomy Training	3/4/2024
Snoopy Pet Grooming	Dog Grooming	2/16/2024
MMHA Leasing Training Academy	Leasing Training	3/7/2024
Alfa IT Solutions, LLC	Data and Related Technology Training	5/28/2024
Yellow Tail Tech	LNx for Jobs; Cloud for Jobs 2.0	3/26/2024
Victrics, LLC	Information System Security Officer (ISSO) and Security Controls Assessor (SCA) Training	5/28/2024
Skin Access Beauty School	Licensed Esthetician	5/28/2024
Esthetics Institute of Southern Maryland	Basic Esthetics	5/16/2024

<b>Not-Exempt (Secretary Approval Required), Continued</b>		
<b>Proposed Institution Name</b>	<b>Programs</b>	<b>Final Action Letter</b>
Legends Beauty, Inc	Cosmetology, Barbering, Esthetics, Master Esthetics, Massage Therapy	4/17/2024
Harmony Dental Academy	Dental Assisting Training	4/17/2024
WorkDev Solutions	"Get Employed" Google IT Support/HDI Customer Support Representative	5/28/2024
Alba Nails Art School	Nail Technician	6/6/2024
KC Medical Training School LLC	Medical Assistant, Phlebotomy Technician, and EKG Technician	2/20/2024
Victoria Assisted Living & Healthcares Services	CNA/GNA	2/16/2024
KC Medical Training2	Medical Assistant, Phlebotomy Technician, and EKG Technician	4/16/2024
Z & Z Hair Academy	Barbering Program	2/16/2024
Omnisource Consulting, Inc.	Cybersecurity Career Pathway Program	3/4/2024
Futech Engineering Solutions, LLC	Drone Operator Training; Cyber Security Training	3/04/2024
A3 Dental Assistant School	Dental Assistant	3/11/2024
Hokett & Son Real Estate Academy*	Maryland Sales Real Estate License	4/4/2024
Mane Obsessionz The School: Hair/Nails/Skin	Cosmetology/Nails/Esthetician	5/29/2024

<b>Exempt (Secretary Approval Not Required)</b>		
<b>Proposed Institution Name</b>	<b>Programs</b>	<b>Final Action Letter</b>
Green Mountain eLearning, LLC	Cultural Competency and Elimination of Bias and other CE courses online	3/19/2024
ACI Learning	Information System Analyst; Network Support Specialist	2/14/2024
CompTIA	CompTIA A+ Live Online Training Program; CompTIA Security+ Live Online Training Program; CompTIA Network+ Live Online Training Program; CompTIA Data+ Live Online Training Program; CompTIA PenTest+ Live Online Training Program; CompTIA CySA+ Live Online Training Program; CompTIA Project+ Live Online Training Program; CompTIA Linux+ Live Online Training Program; CompTIA A+ IT Support Specialist Program; CompTIA Network+: Network Administrator Program; CompTIA Security: Cyber Security Specialist Program; CompTIA Data+: Data Analyst Program; CompTIA ITF+: Introduction to IT Knowledge and Skills Program.	4/4/2024
Academy of Computer Education	CompTIA A+ Training & Certification; A+/Network+; AZ-104T00 Microsoft Azure Administrator; Microsoft Azure Fundamentals Training; CCNA; CEH – Certified Ethical Hacker Training & Certification; CompTIA Network+ Training & Certification; CompTIA Security+	2/16/2024
University of Maryland Medical Center	Certified Nursing Assistant Program	2/27/2024
Innovative Renal Care	New Caregiver Training Program	5/16/2024
Charlotte Hall Veterans Home	CNA/GNA	5/16/2024
SOMD Seaplanes, LLC dba Ready 9 & Southern Maryland Seaplanes	Tailwheel Endorsements; Airplane Single-Engine Seaplane Certification	5/22/2024
Care Health Training Organization	Patient Care Technician	6/3/2024
Loving Hearts Training Center	Phlebotomy Workshop	5/16/2024



Not Regulated (Secretary Approval Not Required)		
Proposed Institution Name	Programs	Final Action Letter
KaiRise	Agile Foundations	2/22/2024
WemaDevOps, LLC	DevOps Training	1/23/2024
Biotech Primer	Antibody Primer; Applying for a Life Science Job; Biomanufacturing Primer; Biopharma Business Acumen Primer; Biosimilars Primer; Cell Therapy Primer; cGMP Primer; Clinical Development 101 General Principles; Clinical Development 201 Phase I; Clinical Development 301 Phase II and III; Clinical Development 401 Phase IV; Diagnostic Development Primer; Diagnostic Measurements Primer; Diagnostic Role in Medicine Today; DNA-Based Diagnostics Primer; Drug Approval Primer; Drug Discovery of Biologics Primer 101; Drug Discovery of Biologics Primer 201; Gene Therapy Manufacturing Primer 101; Gene Therapy Manufacturing 201; Implementing a Biosafety Program Primer; Interviewing for a Life Science Job; Lab Worker Biosafety Primer; Medical Device Approval Primer; Medical Device Commercialization Primer; Medical Device Development Primer; OSHA Bloodborne Pathogen Standard Primer; Pharmaceutical Manufacturing Primer; Preclinical Development Primer 101; Preclinical Development Primer 201; Protein-Based Diagnostics Primer; Recorded BioBasics 101: The Biology of Biotech for the Non-Scientist; Recorded BioBasics 201: Targeted Therapeutics Explained for the Non-Scientist; Recorded Biopharmaceutical Commercialization Immersion; Recorded Drug Development Immersion; Recorded Drug Pricing, Policy, and Utilization Immersion; Recorded Medical Device Development Immersion; Recorded Medical Device Development Immersion; Small Molecule Drug Discovery Primer 101; Small Molecule Drug Discovery Primer 201; The Biology of Biotech	4/17/2024
LPR International	Customer Service; Food Services; Health & Safety; Business Preparedness; Emergency Management	5/16/2024
RoDa Business Solutions	MDOT MBE/DBE/SBE/ACDBE Certification Application Training	2/15/2024
Within U	CompTIA ITF+; CompTIA A+; CompTIA Network+; CompTIA CySA+; CompTIA PenTest+; CompTIA Linux+; CompTIA Project+; CompTIA CASP+; Cisco CCNP; DevNet	5/28/2024
Jordan Peer Recovery	Community Health Worker	2/22/2024

<b>Not Regulated (Secretary Approval Not Required), Continued</b>		
<b>Proposed Institution Name</b>	<b>Programs</b>	<b>Final Action Letter</b>
DTD Enterprises, LLC	DTDs Entrepreneur Leadership Series; DTDs Business Leadership Institute; DTDs Disability Support Leadership Institute; DTDs Preparatory Leadership Training; DTDs Parent University; DTDs Personal Enrichment UNI	5/16/2024
St. Joseph's Medical Career Training Solutions	Medical Assistant (MA); Nursing Assistant (NA); Home Health Aide (HHA); Diagnostic Medical Sonographer (DMS); Leadership Essentials (LE)	5/28/2024
AVS Virtual Assistants		5/28/2024
Madel IT Solutions	Introduction to Information Technology; Fundamentals of Cyber Security	5/28/2024
International Language Academy ILA	Workforce Training for ELL	5/28/2024
DTD	DTD Breaking Poverty Cycles Institute/ DTD's Pre-Employment/Employee Institute/ DTD's Sports Leadership Academy/ DTD's Business Leadership Institute	5/16/2024



**Wes Moore**  
Governor

**Aruna Miller**  
Lt. Governor

**Cassie Motz**  
Chair

**Sanjay Rai, Ph.D.**  
Secretary

## MEMORANDUM

**DATE:** August 28, 2024

**TO:** Commissioners, Maryland Higher Education Commission

**FROM:** Trish Gordon McCown, Director of Academic Affairs

**STAFF:** Alix Chaillou, Associate Director, Institution Review Unit  
Melissa Leuschel, Senior Education Policy Analyst, Institution Review  
Ebony Walters, Education Policy Analyst, Institution Review  
Quentin Snively, Online Education Policy Analyst, Institution Review  
Cara Martinez, Administrative Officer, Institution Review

**SUBJECT:** Report on Institutions of Higher Education Institution Review: Secretary Actions for January 1, 2024 – June 30 2024

During this reporting period, the Secretary of Higher Education acted on a total of **92** actions from the Institution Review Unit under Code of Maryland Regulations (COMAR) 13B.02.01, 13B.02.02, 13B.02.04, 13B.02.05, 13B.02.06, 13B.05.01, and 13B.09.01, and they are outlined immediately below.

<b>Actions by Institution Review Unit</b>	<b>Number of Actions*</b>
In-State Institution Actions	1
Out-of-State Institution Actions	13
Out-of-State Online Registration Actions	29
NC-SARA Actions	22
Religious Exempt Actions	5
Collegiate Complaints Requiring Action by the Secretary	21
Title IX Reimbursements	1
<b>Total Actions for Institution Review</b> <i>*Objections and in-process items not included in this total</i>	<b>92</b>
<b>Institutional Site Visits</b>	<b>8</b>

## I. OBJECTIONS TO NEW IN-STATE INSTITUTIONS AND OUT-OF-STATE PROGRAM PROPOSALS

Code of Maryland Regulations (COMAR) 13B.02.02.06G requires the Commission to circulate new in-state institution proposals for thirty days for comment or objections from in-state institutions. COMAR 13B.02.01.07E and 13B.02.01.08D require the Commission to circulate out-of-state program proposals for thirty days for comment or objections from in-state institutions. What follows is a summary of all in-state objections the Commission has received to programs submitted for review, upon which the Secretary has issued a decision between January 1, 2024 to June 30, 2024.

Proposing Institution/Loc ation	Program Proposed for Renewal	Objecting Institution	Objection Rationale	Action	Rationale for Action	Action Date
Strayer University (Anne Arundel County)	Associate of Arts in Business Administration	Anne Arundel Community College	Unreasonable program duplication	Approved	Renewal of long-standing program	2/22/2024
Strayer University (Anne Arundel County)	Associate of Arts in Marketing	Anne Arundel Community College	Unreasonable program duplication	Approved	Renewal of long-standing program	2/22/2024
Strayer University (Prince Georges County)	Associate of Arts in Accounting	Prince Georges Community College	Unreasonable program duplication	Approved	Renewal of long-standing program	2/22/2024
Strayer University (Prince Georges County)	Associate of Arts in Business Administration	Prince Georges Community College	Unreasonable program duplication	Approved	Renewal of long-standing program	2/22/2024
Strayer University (Prince Georges County)	Associate of Arts in Marketing	Prince Georges Community College	Unreasonable program duplication	Approved	Renewal of long-standing program	2/22/2024
Strayer University (Prince Georges County)	Associate of Arts in Information Technology	Prince Georges Community College	Unreasonable program duplication	Approved	Renewal of long-standing program.	2/22/2024

## II. PROPOSAL FOR IN-STATE INSTITUTIONS (IS)

COMAR 13B.02.02 outlines the requirements for out-of-state institutions of higher education operating or seeking to operate.

Actions by In-State Institutions (IS)		Number of Final Actions*
<b>Stage 1 Applications</b>		1
<i>Approved</i>	1	
<i>Denied</i>	0	
<i>In-process</i>	0	
<i>Withdrawn</i>	0	
<b>Stage 1 applications objected to</b>		0
<b>Stage 2 Applications</b>		0
<i>Approved</i>	0	
<i>Denied</i>	0	
<i>In-process</i>	4	
<i>Withdrawn</i>	0	
<b>Institution Closures</b>		0
<i>In-process</i>	1	
<i>Completed</i>	0	
<b>Site visits</b>		8
<b>Total Actions by IS</b> <i>*objections and in-process not included in this total</i>		9

### III. OUT-OF-STATE INSTITUTIONS (OOS)

COMAR 13B.02.01 outlines the requirements for out-of-state institutions of higher education operating or seeking to operate in Maryland. Unlike in-state proposals, approval of out-of-state institutions expires each year on August 31<sup>st</sup>, unless the institution has been granted an “extended approval” after 5 years of operating in Maryland. Institutions not under extended approval are required to submit a request for renewed approval annually, typically by March 31<sup>st</sup>. At this time, the majority of out-of-state institutions are currently under extended approval; they are expected to submit an application for new programs requested during the extended approval period and a renewal application at the end of their extended approval period.

Actions by Out-of-State Institutions (OOS)		Number of Actions*
<b>Out-of-State Initial Site Applications</b>		0
<i>Approved</i>	0	
<i>Denied</i>	0	
<i>In-Process</i>	0	
<i>Withdrawn</i>	0	
<b>Out-of-State Renewal Site Applications</b>		5
<i>Approved</i>	5	
<i>Denied</i>	0	
<i>In-Process</i>	6	
<i>Withdrawn</i>	0	
<b>Out-of-State New Programs Proposals under Extended Review</b>		8
<i>Approved</i>	8	
<i>Denied</i>	0	
<i>In-Process</i>	0	
<i>Withdrawn</i>	0	
<b>Objections</b>		6
<b>Site Visits</b>		0
<b>Institution Closures</b>		0
<b>Total Actions by OOS</b> <i>*Objections and in-process not included in this total</i>		<b>13</b>

#### IV. OUT-OF-STATE ONLINE EDUCATION REGISTRATION

COMAR 13B.05.01 outline requirements for out-of-state institutions offering fully online programs that do not participate in the National Council for State Authorization Reciprocity Agreements (NC-SARA).

Through the renewal application process, out-of-state institutions report enrolling 5,655 Maryland residents in 1,376 approved online programs.

Actions for Online Registration Institutions (OR)		Number of Actions*
<b>Initial Applications</b>		0
<i>Approved</i>	0	
<i>Denied</i>	0	
<i>In-Process</i>	6	
<i>Withdrawn</i>	0	
<b>Renewal Applications Approved</b>		29
<i>Approved</i>	29	
<i>Denied</i>	0	
<i>In-Process</i>	12	
<i>Withdrawn</i>	0	
<b>Applications Withdrawn</b>		0
<b>Applications Denied</b>		0
<b>Total Actions for OR</b> <i>*In-process not included in this total</i>		<b>29</b>

## V. IN-STATE INSTITUTIONS PARTICIPATING IN STATE AUTHORIZATION RECIPROCITY AGREEMENT (SARA)

COMAR 13B.02.05 outlines requirements for the approval and oversight of in-state institutions participating in SARA.

Actions for SARA Participation	Number of Actions
Initial Applications	1
Renewal Applications	21
Applications Withdrawn	0
Applications Denied	0
Total Actions for NC-SARA	22

### Enrollment data – Fall 2022\*

- 33,978 out-of-state residents enrolled in SARA participating Maryland institutions through SARA participation.
- 3,894 out-of-state residents enrolled in SARA participating Maryland institutions, not enrolled through SARA participation.
- 37,872 total out-of-state residents enrolled in an online program at SARA participating Maryland institutions.
- 1,233 SARA participating out-of-state institutions report enrolling 40,921 Maryland residents in online programs.

\* Data reported by the National Council of State Authorization Reciprocity Agreement (NC-SARA) - <https://nc-sara.org/>



## VI. RELIGIOUS EXEMPT INSTITUTIONS

COMAR 13B.02.04 outlines the requirements to determine if an institution of postsecondary education as a religious educational institution is eligible for exemption from the approval process. Institutions with a religious exemption cannot hold institutional accreditation from a national accreditor recognized by the U.S. Department of Education.

Actions for Religious Exempt Institutions (REX)		Number of Actions*
<b>Initial Applications</b>		2
<i>Approved</i>	2	
<i>Denied</i>	0	
<i>In-process</i>	3	
<i>Withdrawn</i>	0	
<b>Renewal Applications</b>		3
<i>Approved</i>	3	
<i>Denied</i>	0	
<i>In-process</i>	2	
<i>Withdrawn</i>	0	
<b>Total Actions for REX</b>		<b>5</b>
<i>*In-process not included in this total</i>		

## VII. COLLEGIATE COMPLAINTS

Federal Regulation 600.9(a)(1) requires that the State have a process to review and appropriately act on complaints concerning an institution, including enforcing applicable State laws. Furthermore, COMAR 13B.02.02.19G and 13B.02.01.18G require that in-state and out-of-state institutions adhere to published student grievance procedures that assure a fair and timely review of student complaints. COMAR 13B.02.05.07 outlines student complaint procedures for in-state SARA institutions.

<b>Actions for Collegiate Complaints</b>	<b>Number of Actions</b>
In-Process	24
Withdrawn by Request of Complainant	1
Closed due to No Response from Complainant	5
Directed to Alternative Unit/Agency	2
Directed to Complete Process with Institution	4
<b>Required Action by the Secretary</b>	<b>21</b>
<b>Total Received</b>	<b>57</b>
<b>SARA Complaints (included in Total)</b>	<b>4</b>

## VII. TITLE IX REIMBURSEMENTS

Pursuant to Education Article §11-601, COMAR 13B.09.01 outlines guidelines for administering a legal representation fund for Title IX proceedings. Title IX Reimbursement has a maximum allowable amount of \$2400 per proceeding.

<b>Actions for Title IX Reimbursements</b>	<b>Number of Actions*</b>
<b>Reimbursement Requests Received</b>	1
<i>Approved</i>	
<i>In-process</i>	
<i>Denied</i>	
<b>Total Amount Reimbursed</b>	\$1,646
<b>Total Actions for Title IX Reimbursements</b> <i>*In-process not included in this total.</i>	1

## VIII. INSTITUTIONAL SITE VISITS

Institution Name	Reason for visit	Date of visit
Ner Isreal Rabbinical College	Association of Advanced Rabbinical and Talmudic Schools on-site evaluation visit	1/24/24
Washington College	Middle States Reaffirmation on-site evaluation visit	2/25 – 2/28/24
College of Southern Maryland	Middle States Reaffirmation on-site evaluation visit	3/3 – 3/6/24
Prince George’s Community College	Middle States Reaffirmation on-site evaluation visit	3/3 – 3/6/24
Chesapeake College	Middle States Reaffirmation on-site evaluation visit	3/24 – 3/27/24
Mount St. Mary’s University	Middle States Reaffirmation on-site evaluation visit	4/7 – 4/10/24
Baltimore City Community College	Middle States Reaffirmation on-site evaluation visit	4/28 – 5/1/24
Collegium Sanctorum Angelorum	One-Year Site Visit	6/21/2024



**Wes Moore**  
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**Sanjay Rai, Ph.D.**  
Secretary

## MEMORANDUM

**DATE:** August 28, 2024

**TO:** Commissioners, Maryland Higher Education Commission

**FROM:** Trish Gordon McCown, Director of Academic Affairs

**STAFF:** Dr. Lyndsay Silva, Associate Director, Program Review Unit  
Victoria Johnson, Administrative Officer, Program Review Unit  
Glenda Abney, Sr. Education Policy Analyst, Program Review Unit  
Bryson Barksdale, Sr. Education Policy Analyst, Program Review Unit  
Allie Edelstein, Education Policy Analyst, Program Review Unit  
Brittany Martin, Education Policy Analyst, Program Review Unit  
Rose Robinson, Education Policy Analyst, Program Review Unit  
Shayla Hunter, Education Policy Analyst, Program Review Unit  
Alexis Merriman, Education Policy Analyst, Program Review Unit

**SUBJECT:** Report on Institutions of Higher Education Program Review: Secretary Actions for January 1, 2024 to June 30, 2024

During the current reporting period, the Secretary of Higher Education acted on a total of **251** academic program proposals requiring review under Code of Maryland Regulations (COMAR) 13B.02.01 and 13B.02.03, and they are outlined immediately below.

Actions by In-State Institutions (ISI)	Number of Actions	Segment
Programs Objected to	0	at independent colleges and universities
	0	at public four-year colleges and universities
	0	at public community colleges
New Degree Programs	12	at independent colleges and universities
	15	at public four-year colleges and universities
	4	at public community colleges
New Certificate Programs	6	at independent colleges and universities

	16	at public four-year colleges and universities
	13	at public community colleges
<b>New Areas of Concentration</b>	4	at independent colleges and universities
	6	at public four-year colleges and universities
	2	at public community colleges
<b>Substantial Modifications to Existing Program</b>	1	at independent colleges and universities
	3	at public four-year colleges and universities
	9	at public community colleges
<b>Non-substantial Modifications to Existing Program</b>	36	at independent colleges and universities
	31	at public four-year colleges and universities
	75	at public community colleges
<b>Withdrawn Proposals</b>	1	at independent colleges and universities
	1	at public four-year colleges and universities
	4	at public community colleges
<b>Institutional Program Partnerships</b>	3	at independent colleges and universities
	9	at public four-year colleges and universities
	0	at public community colleges
<b>Proposals Not Approved or Recommended</b>	0	at independent colleges and universities
	0	at public four-year colleges and universities
	0	at public community colleges
<b>Total Actions for ISI</b>	63	at independent colleges and universities
	81	at public four-year colleges and universities
	107	at public community colleges
	<b>251</b>	

## I. PROGRAM OBJECTIONS -0

Code of Maryland Regulations (COMAR) 13B.02.03.27B requires the Commission to circulate program proposals for thirty days for comment or objections from in-state institutions.

The Secretary or an institution may file an objection to implementation of a proposed program if the objection is based on:

- a. Inconsistency of the proposed program with the institution’s approved mission;
- b. Not meeting a regional or Statewide need consistent with the State Plan;
- c. Unreasonable program duplication which would cause demonstrable harm to another institution; or
- d. Violation of the State’s equal educational opportunity obligations under State and federal law.

What follows is a summary of all in-state objections the Commission has received to programs submitted for review, upon which the Secretary has issued a decision between January 1, 2024 and June 30, 2024.

Proposing Institution	Program Proposed	Objecting Institution	Objection Rationale	Action	Rationale for Action	Action Date

- During this reporting period, MHEC initiated the process for Program Review regulation updates. A letter was sent to institutions requesting a pause on objections during this review process.

## II. NEW DEGREE PROGRAMS APPROVED/RECOMMENDED – 32

### Independent Four-Year Colleges and Universities – 12

Institution	Degree Award	Academic Program Name	Action Date
Johns Hopkins University	MM	Film and Game Scoring	02/26/24
Johns Hopkins University	MHS	Environmental Health	02/26/24
Johns Hopkins University	MS	Climate, Energy, and Environmental Sustainability	04/17/24
Mount St. Mary's University	BA	Instructional Design & Technology	05/14/24
Johns Hopkins University	MHS	Epidemiology	06/06/24
Johns Hopkins University	PhD	Medical Physics	06/27/24
Johns Hopkins University	MEd	Learning, Design, and Technology	06/27/24
Goucher College	BA	Neuroscience	06/27/24
Johns Hopkins University	BA	Critical Diaspora Studies	06/27/24
Stevenson University	DBA	Healthcare Management	01/08/24
McDaniel College	MS	Speech Language Pathology	01/23/24
Capitol Technology University	BS	Artificial Intelligence	01/23/24

### Public Four-Year Colleges and Universities – 15

Institution	Degree Award	Academic Program Name	Action Date
University of Baltimore	MS	Artificial Intelligence for Business	04/17/24
University of Maryland, College Park	BA	International Relations	06/27/24
University of Maryland, College Park	BA	International Relations	06/27/24
University of Maryland, College Park	MS	Quantum Computing	04/22/24
Salisbury University	BS	Engineering Physics	05/20/24
Salisbury University	BA	Music Therapy	05/02/24

Towson University	BS	Biophysics	05/14/24
Towson University	BS	Interdisciplinary Physics	05/20/24
Bowie State University	BS	Virtual Reality and Gaming	06/17/24
University of Maryland, Eastern Shore	DVM	Veterinary Medicine	01/16/24
University of Maryland, College Park	MS	Data Science	01/16/24
University of Maryland, College Park	MS	Bioinformatics and Computational Biology	01/16/24
University of Maryland, College Park	MS	Applied Machine Learning	01/09/24
Morgan State University	Doc	Integrated Materials Science	01/23/24
Salisbury University	MA	Public Communication	02/05/24

#### **Community Colleges – 4**

<b>Institution</b>	<b>Degree Award</b>	<b>Academic Program Name</b>	<b>Action Date</b>
Frederick Community College	AS	Health Sciences	05/20/24
Baltimore City Community College	AS	Early Childhood Education	01/16/24
Prince George's Community College	AAS	Cloud Technologies	01/23/24
Prince George's Community College	AAS	Data Science and Analysis	01/23/24

### **III. NEW CERTIFICATE PROGRAMS APPROVED/RECOMMENDED - 34**

#### **Independent Four-Year Colleges and Universities – 6**

<b>Institution</b>	<b>Degree Award</b>	<b>Academic Program Name</b>	<b>Action Date</b>
Loyola University Maryland	PBC	Data Analytics and Digital Technologies	03/25/24
Loyola University Maryland	PBC	Finance	03/25/24
Loyola University Maryland	PBC	General Business	03/25/24
Loyola University Maryland	PBC	Leadership and Management	04/22/24
Loyola University Maryland	PBC	Marketing	04/22/24
Johns Hopkins University	PBC	Artificial Intelligence for Business	06/06/24



**Public Four-Year Colleges and Universities – 16**

<b>Institution</b>	<b>Degree Award</b>	<b>Academic Program Name</b>	<b>Action Date</b>
University of Maryland, Global Campus	UDC	Cloud Computing and Networking	02/13/24
University of Maryland, Global Campus	UDC	Crime Scene Investigation	02/13/24
University of Baltimore	PBC	Diversity, Equity, and Inclusion	02/22/24
University of Baltimore	PBC	Essential Conflict Resolution	02/13/24
University of Baltimore	PBC	Global Engagement	03/25/24
University of Baltimore	PBC	Nonprofit Leadership	04/04/24
Towson University	UDC	Geospatial Technologies	06/04/24
University of Maryland, Eastern Shore	UDC	Career and Technology Education	05/20/24
University of Maryland, Eastern Shore	UDC	Work-Based Learning and Career Counseling	06/04/24
University of Maryland, Eastern Shore	PBC	Career and Technology Education	05/20/24
University of Maryland, Eastern Shore	PBC	Work-Based Learning and Career Counseling	05/20/24
University of Maryland, Global Campus	UDC	Drones and Autonomous Systems	05/06/24
University of Maryland, Global Campus	UDC	Artificial Intelligence Foundations	04/14/24
University of Maryland, Baltimore	PBC	Pediatric Palliative Care	01/08/24
University of Maryland, Baltimore	PBC	Research in Palliative Care	01/08/24
University of Maryland, Eastern Shore	UDC	Aviation Maintenance Technology - Airframe	01/26/24

**Community Colleges – 13**

<b>Institution</b>	<b>Degree Award</b>	<b>Academic Program Name</b>	<b>Action Date</b>
Anne Arundel Community College	LDC	Business Management - Small Business Management	03/19/24
Frederick Community College	LDC	Medical Administrative Specialist	04/22/24
Frederick Community College	LDC	Phlebotomist	04/09/24
Frederick Community College	LDC	Tactical Strength and Conditioning	05/06/24
Community College of Baltimore County	LDC	Deaf Interpreter Preparation	04/17/24
Chesapeake College	LDC	Health Sciences	04/17/24
Garrett College	LDC	Engineering, Robotics, & Technology Certificate	01/16/24
Garrett College	LDC	Addictions Counseling Certificate	01/08/24
Community College of Baltimore County	LDC	Criminal Justice Professional Safety	03/25/24

Cecil College	LDC	Data Science	01/26/24
Prince George's Community College	LDC	Animation and Media	01/08/24
Prince George's Community College	LDC	Early Childhood Paraprofessional Educator	01/26/24
Prince George's Community College	LDC	Elementary Paraprofessional Educator	01/26/24

#### IV. NEW AREAS OF CONCENTRATION APPROVED/RECOMMENDED – 12

##### Independent Four-Year Colleges and Universities – 4

Institution	Degree Award	Academic Program Name	Area of Concentration	Action Date
Loyola University Maryland	MEd	Montessori Education	Birth To Three	04/08/24
Loyola University Maryland	MEd	Montessori Education	Early Childhood	04/08/24
Loyola University Maryland	MEd	Montessori Education	Elementary	04/17/24
Loyola University Maryland	MEd	Montessori Education	Professional	04/17/24

##### Public Four-Year Colleges and Universities – 6

Institution	Degree Award	Academic Program Name	Area of Concentration	Action Date
University of Maryland, Baltimore	MS	Global Health	Global Research Ethics	03/25/24
University of Maryland, Baltimore	MS	Global Health	Social Entrepreneurship	03/25/24
University of Maryland, Baltimore	MS	Health Science	Social Entrepreneurship	04/17/24
Towson University	BS	Interdisciplinary Physics	Computational Physics	05/20/24
Towson University	BS	Interdisciplinary Physics	Physics Innovation and Entrepreneurship	06/04/24
Towson University	BS	Interdisciplinary Physics	Planetary Science	05/20/24

##### Community Colleges – 2

Institution	Degree Award	Academic Program Name	Area of Concentration	Action Date
Frederick Community College	AS	Health Sciences	Exercise Science	05/20/24
Frederick Community College	AS	Health Sciences	Public Health Science	05/20/24

## V. SUBSTANTIAL MODIFICATIONS APPROVED/RECOMMENDED – 13

### Independent Four-Year Colleges and Universities – 1

Institution	Degree Award	Academic Program Name	Review Action	Action Date
Loyola University Maryland	MEd	Montessori Education	Substantial Change to Degree Program	04/08/24

### Public Four-Year Colleges and Universities – 3

Institution	Degree Award	Academic Program Name	Review Action	Action Date
University of Maryland, Global Campus	BS	Nursing for Registered Nurses	Substantial Change to Degree Program	03/25/24
University of Maryland, Eastern Shore	PharmD	Doctor of Pharmacy	Substantial Change to Degree Program	04/17/24
Frostburg State University	BA	Political Science (POSCBS)	Substantial Change to Degree Program	06/27/24

### Community Colleges – 9

Institution	Degree Award	Academic Program Name	Review Action	Action Date
Garrett College	AAS	Professional & Technical Studies	Substantial Change to Degree Program	02/13/24
Harford Community College	AAS	Interactive Media Production	Substantial Change to Degree Program	04/23/24
Cecil College	AA	Social Work	Substantial Change to Degree Program	06/17/24
Cecil College	AA	Paralegal Studies	Substantial Change to Degree Program	01/30/24
Prince George's Community College	LDC	Cloud Technologies	Substantial Change to Degree Program	01/23/24
Prince George's Community College	LDC	Data Science and Analysis	Substantial Change to Degree Program	01/23/24
Prince George's Community College	AS	Health Sciences	Substantial Change to Degree Program	05/20/24

Prince George's Community College	LDC	Health Sciences	Substantial Change to Degree Program	02/20/24
Prince George's Community College	LDC	Theatre Performance	Substantial Change to Degree Program	01/26/24

**V. VI. NON-SUBSTANTIAL MODIFICATIONS APPROVED/RECOMMENDED – 142**

**Independent Four-Year Colleges and Universities – 36**

<b>Institution</b>	<b>Degree Award</b>	<b>Academic Program Name</b>	<b>Review Action</b>	<b>Action Date</b>
Johns Hopkins University	Doc	Nursing Practice	Non-Substantial Program Change	02/22/24
Capitol Technology University	BS	Uncrewed and Autonomous Systems	Change Program Title	02/23/24
Capitol Technology University	MS	Uncrewed and Autonomous Systems	Change Program Title	02/23/24
Johns Hopkins University	MHS	Social Factors in Health	Change Program Title	03/19/24
Loyola University Maryland	BA	Communications	Change Program Title	03/26/24
Johns Hopkins University	MS	Counseling	Code Change	06/27/24
Maryland University of Integrative Health	MA	Health & Wellness Coaching	Discontinued Program	05/20/24
Maryland University of Integrative Health	PBC	Health Coaching	Discontinued Program	04/29/24
Maryland University of Integrative Health	PBC	Narrative Health	Discontinued Program	04/29/24
Hood College	BSN	RN Completion	Discontinued Program	04/29/24
Hood College	PBC	Elementary STEM Education	Discontinued Program	05/20/24
Hood College	PBC	Secondary Mathematics Education	Discontinued Program	05/20/24
Maryland University of Integrative Health	MA	Transformative Leadership and Social Change	Discontinued Program	05/07/24
Maryland University of Integrative Health	PBC	Transformative Leadership and Social Change	Discontinued Program	05/07/24
Loyola University Maryland	MBA	Executive Master of Business Administration	Discontinued Program	05/30/24
Loyola University Maryland	MBA	Business Administration – AoC Accounting	Discontinued Program	05/30/24

Loyola University Maryland	MBA	Business Administration – AoC Finance	Discontinued Program	05/30/24
Loyola University Maryland	MBA	Business Administration – AoC Economics	Discontinued Program	05/30/24
Loyola University Maryland	MBA	Business Administration – AoC Marketing	Discontinued Program	05/30/24
Loyola University Maryland	MBA	Business Administration – AoC Management	Discontinued Program	05/30/24
Goucher College	PBC	Climate Change Education	Discontinued Program	06/10/24
Goucher College	PBC	Financial Skills for Managers	Discontinued Program	06/10/24
Goucher College	PBC	Management Essentials	Discontinued Program	06/11/24
Goucher College	PBC	Social Innovation for Managers	Discontinued Program	06/11/24
Goucher College	PBC	Innovative Leadership & Management	Discontinued Program	06/11/24
Goucher College	PBC	Marketing & Communication Skills for Managers	Discontinued Program	06/12/24
Goucher College	PBC	Financial Essentials for Higher Education Managers	Discontinued Program	06/12/24
Goucher College	PBC	Student Development for Higher Education Managers	Discontinued Program	06/12/24
Goucher College	PBC	Fact-Based Narrative	Discontinued Program	06/14/24
Goucher College	PBC	Interactive Multimedia Design	Discontinued Program	06/27/24
Goucher College	PBC	Documenting Communities: Putting Stories to Work	Discontinued Program	06/14/24
Goucher College	PMC	Humanitarian Leadership & Ethical Advocacy	Discontinued Program	06/14/24
Goucher College	MS	Higher Education Policy, Research, & Administration	Suspend Program	03/25/24
Goucher College	PBC	Environmental Communication & Collaboration	Suspend Program	06/27/24

Goucher College	PMC	Historic Preservation Fieldwork & Documentation	Suspend Program	06/27/24
Goucher College	PMC	Historic Preservation & Heritage Conservation	Suspend Program	06/27/24

**Public Four-Year Colleges and Universities – 31**

Institution	Degree Award	Academic Program Name	Review Action	Action Date
University of Baltimore	DPA	Doctor of Public Administration	Non-Substantial Program Change	03/28/24
University of Baltimore	BS	Cyber Forensics	Change Program Modality	02/14/24
University of Baltimore	MS	Cyber Forensics	Change Program Modality	02/14/24
University of Maryland, College Park	BS	Fire Protection Engineering	Change Program Modality	02/26/24
University of Maryland, College Park	MS	Applied Economics	Change Program Modality	03/19/24
Towson University	MEd	Secondary Education	Change Program Modality	01/8/24
Salisbury University	Med	Educational Leadership	Change Program Modality	03/12/24
University of Maryland, Baltimore	MS	Health Science	Change Program Title	02/8/24
University of Maryland, Global Campus	BS	Software Development and Security	Change Program Title	02/8/24
University of Maryland, Baltimore County	BFA	Photography	Change Program Title	03/11/24
University of Maryland, Baltimore County	BA	Gender and Women's Studies	Change Program Title	03/11/24
Towson University	MA	Leadership in Jewish Education and Communal Service	Change Program Title	03/12/24
University of Maryland, Baltimore	MS	Social Work	Change Program Title	06/10/24
University of Baltimore	MS	Counseling Psychology	Change Program Title	06/6/24
University of Maryland, College Park	BS	Community Health	Change Program Title	05/20/24
Towson University	MEd	Special Education	Change Program Title	05/20/24

Towson University	PBC	Autism Spectrum Disorder in the Classroom	Change Program Title	05/20/24
University of Maryland, Baltimore County	PBC	Music Entrepreneurship	Change Program Title	05/20/24
Frostburg State University	BS	Secure Computing and Information Assurance	Change Program Title	05/30/24
University of Maryland, Global Campus	MS	Information Systems and Services	Change Program Title	01/26/24
University of Maryland, Baltimore	MS	Global Health	Discontinued Program	03/11/24
University of Maryland, Baltimore	MS	Social Work	Discontinued Program	05/6/24
Towson University	BS	Biology	Discontinued Program	04/11/24
Frostburg State University	BS	Elementary Education (Major)	Suspend Program	03/28/24
University of Baltimore	PBC	Internal Audit Services	Suspend Program	04/29/24
Frostburg State University	BA	Foreign Languages & Literature	Suspend Program	05/20/24
Frostburg State University	BA	International Studies	Suspend Program	05/20/24
University of Baltimore	MS	Applied Psychology	Suspend Program	06/18/24
University of Maryland, Baltimore County	UDC	Project Management for Information Technology	Suspend Program	06/27/24
University of Baltimore	MBA	Business Administration	Statewide and Health Manpower Designations	05/14/24
University of Maryland, Baltimore	MS	Health Science	Statewide and Health Manpower Designations	03/11/24

### **Community Colleges – 75**

<b>Institution</b>	<b>Degree Award</b>	<b>Academic Program Name</b>	<b>Review Action</b>	<b>Action Date</b>
Community College of Baltimore County	LDC	Transportation, Distribution and Maritime Logistics	Non-Substantial Program Change	02/08/24
Chesapeake College	AAT	Secondary Education - Chemistry	Non-Substantial Program Change	03/27/24
Hagerstown Community College	AS	Environmental Studies	Non-Substantial Program Change	02/27/24



Hagerstown Community College	AAT	Secondary Education - English	Non-Substantial Program Change	03/12/24
Community College of Baltimore County	LDC	Graphic Design	Non-Substantial Program Change	02/27/24
Anne Arundel Community College	AA	Arts and Sciences Transfer -Film Studies	Non-Substantial Program Change	02/20/24
Community College of Baltimore County	AA	Humanities and Social Sciences – AoC Literature	Non-Substantial Program Change	03/11/24
Community College of Baltimore County	AA	Humanities and Social Sciences – AoC Visual Arts	Non-Substantial Program Change	03/11/24
Community College of Baltimore County	AFA	Fine Art and Visual Design – AoC Fine and Performing	Non-Substantial Program Change	03/07/24
College of Southern Maryland	LDC	General Studies: Transfer Certificate	Non-Substantial Program Change	03/20/24
College of Southern Maryland	AAS	Engineering Technology	Non-Substantial Program Change	03/20/24
College of Southern Maryland	ASE	Electrical Engineering	Non-Substantial Program Change	03/19/24
College of Southern Maryland	ASE	Computer Engineering	Non-Substantial Program Change	03/20/24
College of Southern Maryland	AAS	Cloud and Information Technology	Non-Substantial Program Change	03/20/24
College of Southern Maryland	LDC	Cloud and Information Technology	Non-Substantial Program Change	03/20/24
College of Southern Maryland	AA	Arts and Science	Non-Substantial Program Change	03/20/24
Chesapeake College	AAT	Secondary Education – AoC Mathematics	Non-Substantial Program Change	03/28/24
Chesapeake College	AAT	Secondary Education – AoC Physics	Non-Substantial Program Change	04/02/24
Chesapeake College	AAT	Secondary Education – AoC English	Non-Substantial Program Change	03/27/24
Hagerstown Community College	BA	Arts and Sciences – AoC English	Non-Substantial Program Change	03/19/24
Community College of Baltimore County	AAS	Radiography	Non-Substantial Program Change	03/11/24
Anne Arundel Community College	LDC	Cloud Computing	Non-Substantial Program Change	04/04/24
Anne Arundel Community College	AAS	Electronics Engineering Technology	Non-Substantial Program Change	03/26/24
Anne Arundel Community College	LDC	Electronics Engineering Technology	Non-Substantial Program Change	04/10/24



Anne Arundel Community College	LDC	Human Services	Non-Substantial Program Change	05/22/24
Frederick Community College	AAS	Medical Assistant	Non-Substantial Program Change	04/08/24
Frederick Community College	LDC	Medical Assistant	Non-Substantial Program Change	04/08/24
Community College of Baltimore County	AAS	Engineering Technology AoC Computer Aided Design	Non-Substantial Program Change	04/22/24
Community College of Baltimore County	AAS	Engineering Technology – AoC Civil Engineering Technology	Non-Substantial Program Change	04/22/24
Community College of Baltimore County	AAS	Engineering Technology – AoC Electro-Mechanical Engineering	Non-Substantial Program Change	04/22/24
Community College of Baltimore County	AAS	Engineering Technology – AoC Land Surveying	Non-Substantial Program Change	04/22/24
Community College of Baltimore County	AA	Humanities and Social Sciences	Non-Substantial Program Change	03/11/24
College of Southern Maryland	LDC	Cloud and Information Technology	Non-Substantial Program Change	06/06/24
College of Southern Maryland	AAS	Cloud and Information Technology	Non-Substantial Program Change	06/06/24
Cecil College	AAT	Elementary Education	Non-Substantial Program Change	06/11/24
Cecil College	AAS	Agricultural Sciences	Non-Substantial Program Change	06/11/24
Cecil College	AAT	Early Childhood Education	Non-Substantial Program Change	06/11/24
College of Southern Maryland	AAS	Cybersecurity	Non-Substantial Program Change	06/11/24
College of Southern Maryland	LDC	Cybersecurity	Non-Substantial Program Change	06/11/24
Hagerstown Community College	AS	Computer Science	Non-Substantial Program Change	06/27/24
Hagerstown Community College	AAS	Interactive Design and Game Development	Non-Substantial Program Change	06/27/24
Hagerstown Community College	AAS	Digital Forensics Concentration, Information Systems Tech	Non-Substantial Program Change	06/27/24
Hagerstown Community College	AAS	Computer Support Specialist Concentration, Information Systems Tech	Non-Substantial Program Change	06/27/24

Hagerstown Community College	AAS	Network Administration Concentration, Information Systems Tech	Non-Substantial Program Change	06/27/24
Prince George's Community College	AAS	Visual Communication/Graphic Design	Non-Substantial Program Change	01/08/24
Prince George's Community College	LDC	Nursing (LPN)	Non-Substantial Program Change	01/08/24
Prince George's Community College	LDC	Theatre Design and Production	Non-Substantial Program Change	01/08/24
Montgomery College	LDC	Data Science	Change Program Modality	02/22/24
Montgomery College	AAS	Cloud Computing and Networking Technology	Change Program Modality	02/22/24
Montgomery College	AAS	General Graphic Design Area of Concentration	Change Program Modality	02/22/24
Anne Arundel Community College	LDC	Cloud Computing	Change Program Modality	05/22/24
Anne Arundel Community College	AA	Arts and Sciences Transfer - Film Studies	Change Program Title	03/26/24
Anne Arundel Community College	LDC	Management Information Systems	Change Program Title	03/12/24
Chesapeake College	AAT	Secondary Education	Suspend Program	03/27/24
Frederick Community College	LDC	Practical Nursing	Suspend Program	05/07/24
Community College of Baltimore County	LDC	Advanced Geospatial Applications	Suspend Program	05/07/24
Community College of Baltimore County	AAS	Engineering Technology	Suspend Program	05/31/24
Anne Arundel Community College	AA	Arts and Sciences Transfer Music	Suspend Program	06/06/24
Chesapeake College	AA	Health, Fitness, and Exercise Science	Suspend Program	06/27/24
Montgomery College	LDC	Fire and Arson Investigation	Discontinued Program	01/08/24
Garrett College	AAS	Professional Technical Studies	Discontinued Program	02/06/24
Montgomery College	AAS	Fire Prevention Technology	Discontinued Program	01/16/24
Montgomery College	LDC	Fire Prevention Technology	Discontinued Program	01/08/24

Montgomery College	AAS	Fire Protection Technology	Discontinued Program	01/09/24
Montgomery College	LDC	Fire Protection Technology	Discontinued Program	01/08/24
Chesapeake College	LDC	Food Service Management	Discontinued Program	03/11/24
Chesapeake College	AA	Health Fitness and Exercise	Discontinued Program	03/11/24
Montgomery College	LDC	Microcomputer Technician	Discontinued Program	04/11/24
Montgomery College	LDC	Wireless Technology	Discontinued Program	06/06/24
Montgomery College	LDC	Network Engineer	Discontinued Program	04/17/24
Community College of Baltimore County	LDC	Mobile Development	Discontinued Program	05/07/24
Cecil College	AS	Civil Engineering	Discontinued Program	01/08/24
Anne Arundel Community College	LDC	Interprofessional Healthcare	Discontinued Program	01/09/24
Community College of Baltimore County	AA	Native American Studies, Area of Concentration	Discontinued Program	01/26/24
Garrett College	LDC	Addictions Counseling Certificate	Statewide and Health Manpower Designations	02/22/24

## VII. WITHDRAWN PROPOSAL – 6

### Independent Four-Year Colleges and Universities – 1

Institution	Degree Award	Academic Program Name	Action Date
Goucher College	PBC	Environmental Education & Leadership	06/17/24

### Public Four-Year Colleges and Universities – 1

Institution	Degree Award	Academic Program Name	Action Date
University of Maryland, Global Campus	MS	Digital Forensics and Cyber Investigation	06/12/24

### **Community Colleges – 4**

<b>Institution</b>	<b>Degree Award</b>	<b>Academic Program Name</b>	<b>Action Date</b>
Anne Arundel Community College	AS	Mathematics	03/27/24
Anne Arundel Community College	AAS	Mechatronics Engineering Technology	03/27/24
Allegany College of Maryland	AS	Nursing	06/04/24
Anne Arundel Community College	LDC	Financial Accounting	03/05/24

## **VIII. INSTITUTIONAL PROGRAM PARTNERSHIPS/ENGAGEMENT – 12**

### **Independent Four-Year Colleges and Universities – 3**

<b>Institution</b>	<b>Degree Award</b>	<b>Academic Program Name</b>	<b>Review Action</b>	<b>Action Date</b>
Goucher College	BS	Goucher Prison Education Partnership	Closed Site Approval	05/06/24
Goucher College	BA	American Studies	Closed Site Approval	05/20/24
McDaniel College	BSN	Nursing (pre-licensure)	Off-Campus Program - Partnership with Carroll Hospital	06/04/24

### **Public Four-Year Colleges and Universities – 9**

<b>Institution</b>	<b>Degree Award</b>	<b>Academic Program Name</b>	<b>Review Action</b>	<b>Action Date</b>
Bowie State University	BS	Sociology	Closed Site Approval - JCI	02/05/24
Bowie State University	LDC	Entrepreneurship	Closed Site Approval – JCI	02/05/24
Towson University	PBC	Accomplished Teaching for Student Impact	Closed Site Approval – Anne Arundel County Public Schools	04/14/24
Towson University	PBC	Accomplished Teaching for Student Impact	Closed Site Approval – Howard County Public Schools	04/14/24
University of Baltimore	BA	Human Services Administration	Closed Site Approval - JCI	05/06/24
University of Baltimore	BA	Interdisciplinary Studies	Closed Site Approval - JCI	05/06/24
University of Baltimore	UDC	Computer Programming	Closed Site Approval - JCI	05/06/24
Towson University	MAT	Teaching	Closed Site Approval – Baltimore County Public Schools	05/20/24
University of Maryland, Baltimore County	MS	Cybersecurity	Program at Regional Higher Education Center	01/08/24

**Community Colleges – 0**

**IX. PROPOSALS NOT APPROVED/ RECOMMENDED - 0**

**Independent Four-Year Colleges and Universities – 0**

**Public Four-Year Colleges and Universities – 0**

**Community Colleges - 0**



**Wes Moore**  
Governor

**Aruna Miller**  
Lt. Governor

**Cassie Motz**  
Chair

**Sanjay Rai, Ph.D.**  
Secretary

## MEMORANDUM

**DATE:** August 28, 2024  
**TO:** Maryland Higher Education Commission  
**FROM:** Emily A. A. Dow, Ph.D., Assistant Secretary for Academic Affairs  
**SUBJECT:** Proposed Regulatory Amendments – COMAR 13B.02.03  
Academic Program Review – Standard for Substantial Modification

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At the July 24, 2024, Commission Meeting, you were presented with a draft of changes to the standard for substantial modifications under the academic program review process. For your convenience, the rationale for the changes is restated below.

Under § 11–206 of the Education Article, Annotated Code of Maryland, and COMAR 13B.02.03, the Commission reviews proposals for substantial modifications to existing academic programs. The review includes an evaluation of whether the substantial modification would make the existing program duplicative of a program at another institution. Currently, the standard for a modification to an existing program to be considered “substantial” is in COMAR 13B.02.03.03E, and includes:

- a. A change to more than 33 percent of an existing program’s course work;
- b. Offering an existing program as an off-campus program;
- c. Establishing a new area of concentration within an existing program (for example, an institution offers a program in psychology and wishes to add a new area of concentration in employee assistance training, or an institution offers a program in mental health and wishes to offer a new area of concentration in addiction counseling); or
- d. Establishing a new program title within an approved program (for example, an institution offers a program in human resources and wishes to offer a program in human resources management).<sup>1</sup>

HB1244 (Chapter 963 of the Acts of 2024) requires the Commission, in collaboration with institutions of higher education in the State, to “evaluate whether the existing standard that triggers the academic program review process for a substantial modification to an existing program established under...COMAR 13B.02.03.03E is the appropriate standard.”

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<sup>1</sup> COMAR 13B.02.03.03: <https://dsd.maryland.gov/regulations/Pages/13B.02.03.03.aspx>

If the Commission determines that a new standard for establishing a substantial modification to an existing program is appropriate, the Commission must adopt regulations establishing the new standard no later than January 1, 2025.

Enclosed please find proposed regulatory amendments for your approval that:

- Increase the threshold from 33% to 50%;
- *Except from review any changes required by accreditors, licensing boards, or other state or national entity that governs academic program elements required to enter into a particular field or industry;*
- Eliminate the requirement to submit the same information required in a new program proposal as a proposal for a substantial change; and
- Remove text that was outdated or confusing.

The italicized text represents the only change to the draft presented to you on July 24, 2024.

As you know, in March 2024, MHEC convened a workgroup of representatives from all segments of higher education<sup>2</sup> to discuss potential changes to the existing definition of substantial modification. The group met 5 times<sup>3</sup> to provide feedback on the substantial modification standard. At the final meeting on July 31, 2024, all workgroup members agreed that the enclosed amendments reflect their feedback and constitute an appropriate standard for substantial modifications.

The enclosed proposed amendments were prepared by Soma Kedia, Assistant Attorney General, and thus have been approved for legality by an Assistant Attorney General, as required by the Maryland Administrative Procedure Act.

Upon your approval, proposed regulations and regulatory amendments are submitted to the legislature's Joint Committee on Administrative, Executive, and Legislative Review (AELR), after which they are submitted to the Division of State Documents (DSD) for publication in the Maryland Register. After a public comment period, they may be brought back before the Commission for final adoption.

**RECOMMENDATION:** It is recommended that the Commission:

- (1) Approves for publication in the Maryland Register the enclosed proposed regulatory amendments for the substantial modification standard within academic program review; and
- (2) Authorizes its Assistant Attorney General to make non-substantive edits to the proposed regulations to conform to the stylistic and formatting requirements of AELR and DSD.

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<sup>2</sup> Maryland Association of Community Colleges, Maryland Independent College and University Association, Morgan State University, St. Mary's College of Maryland, and the University System of Maryland

<sup>3</sup> March 27; April 17; May 8; May 29, 2024; July 31, 2024

## **Title 13B MARYLAND HIGHER EDUCATION COMMISSION**

### **Subtitle 02 ACADEMIC REGULATIONS**

#### **Chapter 03 Academic Programs — Degree-Granting Institutions**

Authority: Education Article, Titles 11 and 16, Annotated Code of Maryland

##### **.02 Definitions.**

A. In this chapter, the following terms have the meanings indicated.

B. Terms Defined.

(1) “Area of concentration” means a sequential arrangement of courses within a program that:

(a) At the associate’s level is at least 12 semester credit hours, and not greater than 30 semester credit hours;

(b) At the bachelor’s level is at least 24 semester credit hours;

(c) At the master’s level is at least 12 semester credit hours above the bachelor’s degree; and

(d) At the doctoral level is at least 18 semester credit hours above the master’s degree.

(2)—(15) (text omitted)

(16) Off-Campus Program.

(a) “Off-campus program” means, for institutions other than community colleges:

(i) A program in which more than 1/3 of the required course work leading to a bachelor’s degree or a certificate beyond the bachelor’s level is offered by an institution at a location other than the principal location of the institution during any 12-month period; or

(ii) Course work offered at a location other than the principal location of an institution that is advertised as leading to a degree or a certificate beyond the bachelor’s level at that location, regardless of the portion of a program offered at that location.

(b) “Off-campus program” means, for community colleges, course work offered outside the community college service area.

(17)—(21) (text omitted)

(22) “Program” means a structured and coherent course of study with clearly defined learning objectives and intended student learning outcomes, requiring the completion of a specified number of credit hours from among a prescribed group of courses, leading to the award of a certificate or degree.

(23) (text omitted)



(24) “Program proposal” means a ~~submission-proposal~~ for a new program or ~~a proposal for a~~ substantial modification ~~of an existing program submitted~~ for review in the form and manner required by the Secretary.

(25) “Regional higher education center” ~~or “RHEC”~~ has the meaning stated in Education Article, §10-101, Annotated Code of Maryland.

(26)—(28) (text omitted)

~~(29) “Substantial modification” means a major change in an existing program or area of concentration.~~

~~(3029)~~ (text omitted)

### **.03 Statutory Authority of the Commission Regarding Academic Program Review, Approval, and Recommendation.**

A. The Commission shall review program proposals for public institutions, independent institutions, and private for-profit institutions of higher education.

B. For public institutions, the Commission shall review and approve or disapprove program proposals for:

- (1) New programs; and
- (2) Substantial modifications.

C. For independent institutions and private for-profit institutions, the Commission shall review and recommend or not recommend implementation of program proposals for:

- (1) New programs; and
- (2) Substantial modifications.

D. An institution shall submit a program proposal for a new program to establish:

(1) A program leading to a formal award in a subject area in which the award is not presently authorized;

(2) A program in a subject area in which a formal award is offered at a different degree level (for example, an institution awards a Bachelor of Science (B.S.) in chemistry and wishes to award a Master of Science (M.S.) in chemistry, or an institution wishes to offer an associate degree in addiction counseling, but currently offers only a lower-division certificate in addiction counseling);

(3) A new undergraduate major by combining course work offered in two or more existing programs (for example, an institution wishes to offer a program in biochemistry by permitting students to combine course work offered in its current programs in biology and in chemistry); or

(4) A formal award of a different type in a subject matter area in which another formal award at the same level is already offered (for example, an institution awards the Master of Science in Management (M.S.) and wishes to offer a Master of Business Administration (M.B.A.), or an

institution awards an Associate of Applied Science (A.A.S.) and wishes to offer an Associate of Arts (A.A.) or Associate of Science (A.S.)).

E. An institution shall submit a program proposal for a substantial modification to:

- (1) Change more than ~~33-50~~ percent of an existing program's course work, unless all of the proposed changes are required by an accreditor, licensing board, or other state or national entity that governs academic program elements required to enter into a particular field or industry;
- (2) Offer an existing program as an off-campus program or at a regional higher education center; or
- (3) Establish a new area of concentration within an existing program. ~~(for example, an institution offers a program in psychology and wishes to add a new area of concentration in employee assistance training, or an institution offers a program in mental health and wishes to offer a new area of concentration in addiction counseling); or~~
- (4) ~~Establish a new program title within an approved program (for example, an institution offers a program in human resources and wishes to offer a program in human resources management);~~

F. Program Review Process.

(1) If the Commission fails to act on a program proposal within 60 days after the submission of the program proposal to the Commission, the program is officially approved without any further action of the Commission.

(2) If the Commission disapproves or does not recommend a proposal, the Commission shall provide to the institution's governing board a detailed written explanation of the reasons for the disapproval or non-recommendation under this Chapter.

(3) After revising a proposal to address the Commission's reasons for disapproval or non-recommendation, the governing body may resubmit the revised proposal to the Commission in accordance with the schedule in Regulation .27 of this chapter, thereby triggering a new 60-day time frame for Commission action.

G. Implementation of Programs.

(1) A public institution may not implement a new program or a substantial modification to an existing program without the prior approval of the Commission.

(2) Implementation of Program by Independent Institution.

(a) If an independent institution has implemented a new program or a substantial modification to an existing program contrary to the non-recommendation of the Commission that was based on a finding of unreasonable or unnecessary duplication, the Commission may recommend that the General Assembly reduce the institution's appropriation by the amount of aid associated with the full-time equivalent enrollment in that program.

(b) The provision in §G(2)(a) of this regulation does not preclude the independent institution from implementing the new program or substantial modification.

**Commented [SK1]:** These changes are not related to substantial modification, but rather to the implementation of other portions of HB1244 (revision of review meeting process).

**Commented [SK2]:** This change is not related to substantial modification, but rather to the implementation of other portions of HB1244 (differentiation between unreasonable and unnecessary duplication).

(c) If the General Assembly reduces program funding, the affected independent institution may apply annually to the Commission for reconsideration of the program review decision.

(3) A private for-profit institution may implement a program notwithstanding the non-recommendation of the Commission.

(4) If an independent institution or a private for-profit institution implements a program despite a recommendation from the Commission that the program not be implemented, the institution shall notify both prospective students of the program and enrolled students in the program that the program has not been recommended for implementation by the Commission.

H.—I. (text omitted)

#### **.06 Criteria for ~~Program Review~~ of a Proposal for a New Program.**

A program proposal for a new program shall address the following areas:

A. Centrality to mission and planning priorities, relationship to the program emphasis as outlined in the mission statements, and an institutional priority for program development;

B. Critical and compelling regional or Statewide need as identified in the State Plan;

C. Quantifiable and reliable evidence and documentation of market supply and demand in the region and service area;

D. Reasonableness of program duplication, if any;

E. Relevance to the implementation or maintenance of high-demand programs at HBIs;

F. Relevance to the support of the uniqueness and institutional identities and missions of HBIs;

G. Adequacy of curriculum design, program modality, and delivery to related learning outcomes, consistent with Regulation .10 of this chapter;

H. For public institutions, adequacy of articulation and transfer planning, consistent with Regulation .19 of this chapter;

I. Adequacy of faculty resources, consistent with Regulation .11 of this chapter;

J. Adequacy of library resources, consistent with Regulation .12 of this chapter;

K. Adequacy of physical facilities, infrastructure, and instructional equipment, consistent with Regulation .13 of this chapter;

L. Adequacy of financial resources with documentation, consistent with Regulation .14 of this chapter;

M. Adequacy of provisions for evaluation of program, consistent with Regulation .15 of this chapter;

N. Consistency with the Commission's minority student achievement goals;

O. Relationship to low productivity programs identified by the Commission; and

P. Adequacy of distance education programs under Regulation .22 of this chapter.

## **.20 Off-Campus Programs.**

**A. Waiver of On-Campus Requirement.** A proposal for a substantial modification shall be submitted to offer an existing on-campus program at an off-campus location, including a regional higher education center.

**B.** Except as set forth in §C of this regulation, an institution may not submit a program proposal for a new program to be offered as an off-campus program.

**C.** An institution may submit a program proposal for a new program to be offered at a regional higher education center.

(1) An off-campus program may be approved only if there is already an existing on-campus program unless a waiver of the on-campus requirement is approved by the Secretary pursuant to this section.

(2) The Secretary shall grant a waiver if the Secretary finds that the program:

(a) Meets the requirements of a new program under Education Article, §11-206, Annotated Code of Maryland, and the requirements of this chapter; and

(b) Will be offered at a regional higher education center.

(3) A program that receives a waiver under this section may not be approved at any location other than a regional higher education center unless it also is offered on-campus at the institution's principal location.

**B.** A program proposal for an off-campus program shall be submitted by the institution to the Commission and contain the following information regarding need and demand for extending the program and the impact the program may have on similar programs that may exist in the region:

(1) The title of the program and the degree or certificate to be awarded;

(2) The resource requirements for the program and the source of funds to support the program for the first 2 years of program implementation;

(3) The need and demand for the program in terms of:

(a) Specific local, State, and national needs for graduates;

(b) Job opportunities that are available to those who complete the program; and

(c) Evidence of market demand through supporting data, including results of surveys that have recently been conducted;

(4) A description of the following, if a similar program is offered within the same geographical region of the State:

(a) Similarities or differences in the degree to be awarded;

(b) Area of specialization; and

**Commented [SK3]:** The information in Sections B through F will be moved to the Administrative Procedures Manual and modified as necessary. Substantial Modification proposals will likely require different elements depending on whether a curricular change is being made or an existing program is being offered off-campus.

(c) Specific academic content of the program;

(5) A description of the method of instructional delivery, including distance education, on-site faculty, and the mix of full-time and part-time instructors; and

(6) A brief description of the academic oversight, quality control, and student services to be provided.

C. An institution offering an off-campus program shall provide for adequate and appropriate library resources within reasonable distance of the instructional site or through institution-sponsored electronic collections and databases.

D. Faculty.

(1) Students shall be taught by qualified faculty with appropriate experience.

(2) At least 1/3 of the classes offered in an off-campus program shall be taught by full-time faculty of the parent institution.

E. An off-campus program shall:

(1) Be complete and coherent;

(2) Provide for either real-time interaction or delayed interaction between faculty and students and among students;

(3) Provide appropriate oversight of the program offered by qualified faculty from the parent institution; and

(4) Provide enrolled students with reasonable and adequate access to the range of academic and support services appropriate to support their learning, including academic advising, counseling, library and other learning resources, and financial aid.

F. An institution has responsibility for:

(1) Evaluating the program's educational effectiveness, student learning outcomes, student retention, and student and faculty satisfaction; and

(2) Providing to faculty with professional development activities, appropriate training, and other support.



**Wes Moore**  
Governor

**Aruna Miller**  
Lt. Governor

**Cassie Motz**  
Chair

**Sanjay Rai, Ph.D.**  
Secretary

## MEMORANDUM

DATE: August 28, 2024  
TO: Commissioners, Maryland Higher Education Commission  
FROM: Emily A. A. Dow, Ph.D., Assistant Secretary for Academic Affairs  
SUBJECT: Update on Appendix for Workforce Needs Analysis

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In the 2024 Legislative Session, the General Assembly passed HB1244 (CH963 of the Acts of 2024), which requires the Maryland Department of Labor (“MDL”), the Maryland Department of Commerce (“Commerce”), and MHEC to collectively define, identify, and compile data regarding the workforce needs in the State. In identifying state and regional workforce needs and emerging workforce need programs, we are expected to:

- Use uniform and consistent baseline data, including common sources and measurements, about workforce needs developed in collaboration with Commerce and MDL;
- Consult, as necessary, with other state agencies with unique expertise in specific workforce segments, including the Maryland Longitudinal Data System Center, occupational licensing boards, and national organizations;
- Use data from resources and literature relating to specific occupations;
- Provide all institutions of higher education in the state with access to this baseline data; and,
- Consult with each segment of higher education.

As a result of this collaboration, MHEC is expected to publish an annual appendix to the Higher Education State Plan that identifies (a) the current and emerging state and regional workforce needs and (b) any specific academic programs institutions could develop to fulfill or support the identified needs. MHEC, MDL, and Commerce have had initial discussions to develop this work.

### Process

To do this work, we will begin with existing lists and resources developed by MDL and Commerce. Each agency has unique data and specific analyses that identify in-demand industries and occupations, as well as key industries of focus. Further refinement of the in-demand and emerging workforce list will be in consultation with various community partners.

Taken together, the existing resources from MDL and Commerce will be the essential building blocks to develop the State and regional workforce and emerging needs analysis for the Higher

Education State Plan. Representatives from the three agencies will continue to collaborate to develop four lists for inclusion in the appendix to the Higher Education State Plan:

- a. A list of state and regional workforce needs;
- b. A list of academic programs that would address the state and regional workforce need;
- c. A list of emerging workforce needs; and
- d. A list of “emerging workforce need programs.”<sup>1</sup>

Baseline data has primarily been sourced from MDL’s analysis of in-demand and emerging industries and occupations. The analysis follows a similar methodology to one MDL has already developed and uses for their state plan for federal Workforce Innovation Opportunity Act funding.<sup>2</sup> MDL recently provided MHEC with the following three lists for consideration.

#### 2023 Maryland Workforce Exchange Data

In-demand occupations were determined by reviewing the number of new Maryland job postings for each occupation in 2023. Job postings data came from the Maryland Workforce Exchange. This information provides important historical data for consideration.

#### Occupational Projections

Projected demand by occupation was based on data from MDL's custom industry and occupation projections. Every two years, MDL creates 10-year forecasts of growth by industry and occupation for Maryland and each of its Local Workforce Development Areas. This summer, MDL released projections for 2022 through 2032 which centers on the annual average number of openings each year. The annual average number of openings each year represents the number of positions that become open due to growth (brand-new positions), labor force exits (e.g., an older worker in the role retires), or occupational transfers (a worker switches careers).

#### Emerging Occupations

Emerging occupations were estimated as those where the “location quotient” for the occupation was less than one. A location quotient measures how concentrated an occupation is in Maryland and is calculated as the percent of Maryland's workforce in a given occupation divided by the percent of the national workforce in that occupation. Future growth and estimated openings for emerging occupations again came from MDL's projections.

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<sup>1</sup> “Emerging workforce needs program” has a specific definition in HB1244: “A graduate level program identified by the Commission in the State Plan for Higher Education or each annual update to the workforce needs as an appendix to the Plan under subsection (c)(2)(i)1 of this section that: (i) no institution of higher education in the State offers; (ii) Addresses a job or industry need that is innovative, unique, and rare; and (iii) could leverage federal, State, or private resources on a long-term basis with immediate development by an institution of higher education.” The law specifies that “emerging workforce need program does not mean a specific academic program identified by the Commission to fulfill or support an identified current State and regional workforce need.”

<sup>2</sup> The Workforce Innovation and Opportunity Act (WIOA) is a major federal grant program operated through each state and is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need. WIOA requires states to strategically align their core workforce development programs to coordinate the needs of both job seekers and employers through combined four-year state plans. See <https://www.labor.maryland.gov/employment/wioa.shtml> for additional information.

## Next Steps

We are currently sorting through MDL's analysis and aligning it with Commerce's "key industry" list to finalize an initial list of (a) state and regional workforce needs and (b) a list of emerging workforce needs. The lists will include the projection data from MDL that justify inclusion on the lists.

Similarly, MHEC staff is currently preparing complimentary lists of (a) academic programs that would address the statewide and regional workforce need and (b) "emerging workforce need programs."

We expect to have draft lists for the Commission's review and approval at the September meeting, so that we can then circulate it to the larger higher education community and other relevant partners (e.g. licensing boards) for review and feedback. We will give these organizations an opportunity to provide supplemental data to inform inclusion or exclusion on the final list.

At the same time, we are working to convene the Advisory Council on Workforce Shortage<sup>3</sup> which has a specific charge to:

- (i) Identify workforce shortage fields in the State; and
- (ii) Recommend to the Commission:
  - a. Priority workforce shortage fields to be included in the Workforce Shortage Student Assistance grant program; and
  - b. The removal of fields that in the Advisory Council's judgment no longer qualify as workforce shortage fields.

The Council can simultaneously use the draft lists to inform the inclusion of specific occupations for the purposes of the Grant while also soliciting input on the list itself. We expect to hold the first Council meeting towards the end of September.

Once we have feedback from various partners on the workforce needs list, we will review with MDL and Commerce and propose any final changes at a future Commission meeting. The Commission will need to approve the 4 lists for submission to the Legislative Policy Committee for review and feedback prior final adoption of the lists as an appendix to the Higher Education State Plan.

This is a preliminary process and will be revised based on feedback from the various community partners regarding additional data sources for consideration. MHEC, MDL, and Commerce will need to review those data sources and consider their merits (e.g., validity of the data source, methodology for analysis, inclusion/exclusion criteria for analysis, etc.) as a consideration in the baseline analysis moving forward.

**RECOMMENDATION:** This item is for informational and discussion purposes only.

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<sup>3</sup> Education Article §18-708 establishes the Workforce Shortage Student Assistance Grant program and a subsequent advisory council.





Wes Moore  
Governor

Aruna Miller  
Lt. Governor

Cassie Motz  
Chair

Sanjay Rai, Ph.D.  
Secretary

## MEMORANDUM

DATE: August 28, 2024  
TO: Commissioners, Maryland Higher Education Commission  
FROM: Emily A. A. Dow, Ph.D., Assistant Secretary for Academic Affairs  
SUBJECT: Academic Program Review Changes:  
Update on Unreasonable Duplication Analysis

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In the 2024 Legislative Session, the General Assembly passed HB1244 (CH963 of the Acts of 2024), which requires MHEC must adopt regulations with procedures that clearly identify all the specific criteria and factors (e.g., standards) for the analysis of unreasonable duplication and unnecessary duplication.

MHEC staff have consulted with agency AAGs to identify the appropriate standards regarding unreasonable duplication and unnecessary duplication. Unreasonable duplication and unnecessary duplication are conceptually different. HB1244 makes the following changes to the statute (*italics means new language; strikethrough means language deleted*):

“Unreasonable program duplication which would cause ~~demonstrable~~ harm to ~~another institution~~  
*the State or students attending institutions of higher education in the State*”

“~~Violation~~ *unnecessary program duplication in violation* of the State’s equal educational opportunity obligations under state and federal law”

Currently, MHEC is envisioning a two-step analysis for unreasonable duplication, broken into two broad questions. First, is the academic content between the two programs duplicative? To answer this question, MHEC would use a combination of basic indicators and an analysis of the curriculum to determine if the proposed program is duplicative to existing programs. This would include a review of program learning objectives; projected competencies, skills, or expected employment; a course-by-course analysis; and, other program requirements, such as a required experiential learning opportunity (e.g., internship, study abroad), thesis or dissertation requirements, the availability of concentrations and if they are required, etc. If content is determined to be substantially different, then proposed program is not duplicative and objection analysis stops (i.e. no need to consider reasonableness or harm).

If the content is determined to be duplicative, the analysis would move on to the second question: is it unreasonable duplication that would cause harm to the State or students? As required by HB1244, the analysis will prioritize workforce need. There are several other factors that could be included in this analysis to determine “harm to the State or students.” For

undergraduate degrees, will program have a partnership (articulation agreement) with a community college for transfer options? Is there excess student demand? Is it a good use of state resources to have an additional program in the State? Answers to these questions will inform the analysis to determine if the duplication would cause harm to the State or students and therefor is unreasonable.

Unnecessary duplication standards are being developed in conjunction with the AAG, who is conducting legal research on the relevant standards in order to operationalize them into a step by step analysis in the same manner as the unreasonable duplication analysis.

MHEC staff expects to present additional updates and draft regulations for the Commission's consideration at future meetings.

**RECOMMENDATION:** This item is for informational and discussion purposes only.



**Wes Moore**  
Governor

**Aruna Miller**  
Lt. Governor

**Cassie Motz**  
Chair

**Sanjay Rai, Ph.D.**  
Secretary

## **Maryland Higher Education Commission 2024 Meeting Dates**

The Maryland Higher Education Commission (MHEC) is Maryland's higher education coordinating board responsible for the management of statewide financial aid programs and the establishment of statewide policies for public and private colleges and career schools to support students' postsecondary pursuits.

*Commission meetings are held on the 4<sup>th</sup> Wednesday of each month from 10:00 a.m. to 1:00 p.m., with certain exceptions, as noted below.* Meetings in 2024 will be in-person in the 7<sup>th</sup> Floor Boardroom at the Nancy S. Grasmick State Education Building, 200 West Baltimore Street, Baltimore, MD 21201. Meetings will also be livestreamed.

### Scheduled Meeting Dates for 2024

**January 24, 2024**

**February 28, 2024**

**March 20, 2024**  
(3<sup>rd</sup> Wednesday)

**April 24, 2024**

**May 22, 2024**

**June 26, 2024**

**July 24, 2024**

**August 28, 2024**

**September 18, 2024**  
(3<sup>rd</sup> Wednesday)  
\*10:00 a.m. to 4:00 p.m.\*

**October 23, 2024**

**November 20, 2024**  
(3<sup>rd</sup> Wednesday)

**December 11, 2024**  
(2<sup>nd</sup> Wednesday)

*Dates, times, and locations are subject to change.*

Please check this website for livestream links and the most up-to-date information:

<http://www.mhec.maryland.gov/About/Pages/Meetings.aspx>