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The Honorable James D. Fielder, Jr., Ph.D.  
Secretary of Higher Education  
Maryland Higher Education Commission  
6 North Liberty Street  
Baltimore, MD 21201

Dear Secretary Fielder:

This letter is in response to the University of Baltimore's (UB) objection to Goucher's proposed Bachelor of Professional Studies (BPS) in Health Services Management. Goucher's response is detailed below.

#### **POINT 1: Mission**

UB OBJECTION: UB asserts in its objection that the BPS is not consistent with Goucher's mission, writing that *"This BPS is not tied to existing curriculum at Goucher, nor does it appear to be consistent with the Mission of Goucher College...Rather, the proposed BPS is professional in nature..."* (see UB letter dated April 12, 2019).

GC RESPONSE: Goucher College currently offers an undergraduate minor in Public Health, an undergraduate program in Pre-Health/Pre-Med Studies, and a Post-Baccalaureate Certificate in Pre-Med program at the graduate level, clearly establishing the curriculum connection that UB has overlooked. In addition, Goucher's Welch Center for Graduate and Professional Studies, which has developed and will deliver the BPS degree, emphasizes in its mission that it prepares professionals to advance in their career; each of its graduate and career development programs are professionally-focused. As stated on the Welch Center website: *"With online, in-person, hybrid, and low-residency programs, you earn a graduate or professional degree from Goucher in the format that fits your learning style, your life, and your goals."*

#### **POINT 2: The BPS Degree: Completion versus Transfer**

UB OBJECTION: UB states in its objection that *"The University of Baltimore ...has an upper division-only program in health systems management that has always been transfer-oriented and structured to be friendly to working adults. The program...has since its 1999 launch accepted as a block in transfer any associate of applied science degree in any area of allied health. This is an open agreement available to all graduates of all Maryland community colleges in relevant programs who are otherwise admissible."*

GC RESPONSE: A review of UB's open agreement (referenced in the UB letter dated April 12, 2019) reveals that this open agreement is a standard transfer document that fully accepts the AA or AS degree, but brings the bulk of the AAS degree in as general electives. This UB open agreement clearly differentiates between the traditional transfer degrees (AA and AS) and the AAS, as noted in the example below from UB's open agreement with BCCC:

*V. Transfer of Credit to BCCC Credit to UB*

*Subject to the terms and conditions of this agreement , UB shall accept transfer of BCCC credits up to a maximum of sixty-three (63) applicable semester credit hours. Students transferring to UB with an associate's of arts (AA) or an associate's of science (A.S) degree will satisfy all lower-division general education course requirements of the UB baccalaureate degree.*

*Students transferring to UB with an associate of applied sciences (AAS) degree may be required to take additional lower-division general education courses to satisfy UB baccalaureate degree requirements.*

In contrast, Goucher has developed, in accordance with the following COMAR regulations, an adult undergraduate degree completion program that will be delivered fully online in eight-week terms to community college AAS graduates:

COMAR 13B.02.03.24  
.24 Degree Programs.

*I. Bachelor of Technical Studies (B.T.S.) or Bachelor of Professional Studies (B.P.S.).*

*(1) An institution may award a Bachelor of Technical Studies (B.T.S.) or Bachelor of Professional Studies (B.P.S.) degree of at least 120 credit hours awarded for the successful completion of an A.A.S. degree, an advanced program of study in the designated area of concentration, and a three-credit hour internship related to the program.*

*(2) Under an articulated agreement, students who have completed an A.A.S. degree may obtain a Bachelor of Technical Studies or a Bachelor of Professional Studies in a related, specialized area of concentration at an institution with degree-granting authority in this State. The area of concentration shall be specified by the institution granting the Bachelor of Technical Studies or Bachelor of Professional Studies. The receiving institution shall accept not less than 60 credit hours and not more than 64 credit hours for the Associate of Applied Science (A.A.S.) degree.*

*(3) The Commission shall provide information on technical or professional fields that have graduated significant numbers of students and for which one or more community*

*colleges request an articulated bachelor of technical or bachelor of professional studies degree. Institutions that wish to participate in developing a Bachelor of Technical Studies or Bachelor of Professional Studies shall meet and develop a memorandum of understanding. Participating institutions shall notify the Commission of their intent to develop the new degree program.*

*(4) A memorandum of understanding shall be drafted and agreed to by institutions. The memorandum of understanding shall address procedures for admissions, registration, advising, student services, financial aid, tuition, and faculty resources. Programmatic and degree requirements shall also be identified. The program shall include an internship which encompasses specific competencies and is a minimum of three credit hours. The program shall be made available at the principal location or other convenient locations, or both. The program may also be delivered through distance education.*

Goucher's BPS requires no additional coursework to complete year one and year two requirements. Students enter the program under individual MOUs with the community colleges and begin as first semester third year students on day one, having completed the entirety of their first two years at the community college. There is no course-by-course articulation between the AAS and the BPS, and no additional Goucher-specific courses or general education courses required, as noted in the example below from Goucher's MOU with BCCC:

**A. Responsibilities of the Institutions**

*The Institutions agree to implement the transfer of Qualifying Students in accordance with applicable law and the following requirements and protocols:*

- 1. A Qualifying Student may transfer from BCCC into Goucher College for the completion of the Bachelor of Professional Studies degree.*
- 2. Goucher College will accept the full AAS degree awarded at BCCC in one of the eight (8) AAS programs listed above (60 credits total) as completion of the first two years of the Bachelor of Professional Studies program at Goucher.*
- 3. The transferring student will complete an additional 60 credits at Goucher College online with no residency requirement to fulfill the third and fourth year of the BPS program.*

**POINT 3: Future Plans**

UB OBJECTION: UB also asserts in its letter (dated April 12, 2019) that "We at UB are concerned not only that such a BPS at Goucher would interfere with our existing recruiting but that it would also inhibit our ability to offer a BPS."

GC RESPONSE: Goucher's strategic growth and a student's ability to access programs consistent with a chosen college and career path should not be impeded by UB's potential future program development plans. Goucher should not be expected to guess which programs UB may decide to develop in the future, nor to then be expected to make its own program development decisions based on that guess.

Additionally, UB's degree in health systems management is a Bachelor of Science, while Goucher's proposed degree is a Bachelor of Professional Studies. The differences between these two types of degree programs extend well beyond their names. COMAR establishes different parameters for the BA/BS and the BPS/BTS in terms of their curriculum and requirements. These degrees are not interchangeable, as illustrated by the fact that an institution offering a BS and a BPS in the same academic discipline would require completely separate program approvals from MHEC. Further, there is a difference between a bachelor's degree program that is "transfer-oriented," as UB characterizes its program, and the BPS, whose fundamental purpose is to facilitate bachelor's degree completion for AAS graduates.

In closing, the difficulty of transfer from the community college to a Maryland four-year institution is well-documented in the state. Goucher's BPS addresses this well-known roadblock, and provides ease of access and a clear path to degree completion to students for whom a four year degree was often out of reach. Goucher College and our community college partners have invested significant time and resources to design, develop, and prepare to deliver a new degree option for career-track community college AAS graduates. This program is in direct response to the statewide need identified by the MHEC Task Force that was convened to consider four year degree options for the community colleges. Goucher has followed the process outlined in COMAR, has utilized the templates that were developed out of the Task Force and were disseminated by MHEC, and has submitted to MHEC signed MOUs with Maryland community colleges as requested. Goucher is ready today to deliver the BPS program beginning June 3, 2019, and respectfully requests authorization to move forward immediately with no further delay.

Sincerely,



Jose Antonio Bowen, Ph.D.  
President