Emily A. A. Dow, PhD

Assistant Secretary for Academic Affairs

Maryland Higher Education Commission

6 North Liberty Street

Baltimore, MD 21201

July 15, 2020

Dear Dr. Dow,

As Southeastern University of Florida (SEU) resubmits is application for extension of an Associates of Arts in General Education (classroom and distance education) in Montgomery County, we, the senior vice presidents for academic affairs and members of the Maryland Association of Community Colleges feel it necessary to strongly express our dissent. Based on our commitment to comprehensive, affordable education and student success, we have grave concerns about SEU’s expanded presence and its AA degree being approved by MHEC. We favor students having access to myriad institutions for completing their baccalaureate degree; however, there is no demonstrable need for a competing General Education AA. In our opinion, contrary to SEU’s claims, Montgomery County does not need an additional institution offering an AA. Montgomery College (MC) is affordable, accessible, and has the capacity to meet students’ needs on its three campuses plus multiple sites throughout the county that offer evening and weekend classes to accommodates students’ varying schedules. Moreover, MC offers the AA in General Studies fully online and with Open Educational Resources (OERs), learning materials freely available in the public domain that can significantly reduce costs for students. We wish to reaffirm to MHEC that application for SEU’s Bachelor of Science (BS) in Ministerial Leadership and the Associates of Ministerial Leadership (AML) are not causes for concern, but the application should be rejected if the Associate of Arts (AA) in General Education remains part of the proposal. Our concerns and recommendations are listed below and described in more detail on subsequent pages.

**Descriptions of Our Concerns:**

1. **SEU proposes an AA in General Education, which overlaps with the General Studies AA offered at MC.**
2. **SEU’s AA in General Studies requires 62 credit hours, which is not compatible with CCRCCA.**
3. **SEU’s tuition and fees are higher than in-county tuition and fees at MC.**

**Recommendation to MHEC:**

**Reject Southeastern University’s application for an Associate of Arts degree in General Education.**

**Descriptions of Our Concerns:**

**1) SEU offers an AA in General Education, which overlaps with the General Studies AA offered at MC.**

The Learning outcomes for SEU’s General Education AA degree overlap MC’s degree, specifically:

* Apply critical thinking, quantitative reasoning, and/or scientific reasoning skills by articulating, analyzing, and evaluating problems and scenarios across discipline areas.
* Find, evaluate, use, and synthesize information needed to address increasingly complex problems and scenarios.
* Use technology effectively to accomplish a variety of general and discipline specific activities.
* Communicate effectively in writing and orally appropriately across disciplines.

SEU’s Associate of Arts – Extension Site/Regional Campus Two-Year Course Plan states “The AA degree includes the core learning components and competencies commonly accepted as foundational for a four-year baccalaureate degree by many colleges and universities.” Although 16 credits are dedicated to a Christian-based curriculum, the remaining 26 credits, as well as desired demonstrated skills, overlap with our Middle States Commission on Higher Education General Education requirements. MC’s General Studies degree requires a minimum of 31 general education credits, although many of the electives are also general Education courses. Montgomery College, the state’s largest community college, has three campuses in the county, one just five miles from the SEU Gaithersburg site. MC students are required to take a virtual central group of courses in English, mathematics, arts, behavioral and social sciences, humanities and lab sciences as SEU requires for its AA.

The chart below demonstrates significant areas of overlap.

**Southeastern University and Montgomery College**

**Overlaps in General Studies and General Education Coursework**

|  |  |
| --- | --- |
| **SEU** | **MC** |
| English Composition I | Introduction to College Writing |
| Introduction to Psychology | PSYC102 General Psychology |
| English Composition II | Critical Reading, Writing, and Research |
| College Algebra | No credit-level |
| Quantitative Reasoning | BSAD210 Statistics for Business |
| Topics in Mathematics | Math 120 Survey of College Mathematics |
| Explorations in Mathematics | MC Reduced # of gateway courses such as the Explorations in Mathematics course SEU offers |
| Introduction to Probability and Statistics | Math 117 Statistics |
| Data Management and Analysis | CMAP 245 Database Applications |
| Theatre Appreciation | THET100 Introduction to the Theater |
| Introduction to Humanities |  |
| Elements of Music | MUSC110 Listening to Music |
| Fundamentals of Speech | COMM108 Foundations of Human Communication |
| Introduction to Literature | ENGL 190 Introduction to Literature |
| Introduction to Forensic Science (lecture/lab) | N/A |
| Life Science (lecture/lab) | BIOL150 Principles of Biology |
| Essentials of Human Anatomy | BIOL212 Human Anatomy Physiology |
| General Electives (2) |  |
| Introduction to Ethics | PHIL140 Introduction to the Study of Ethics |
| Humans in Society | SOCY100 Introduction to Sociology |
| Marriage and Family | SOCY214 Marriage and Family |
| Introduction to Economics | ECON105 Introduction to Economics |
| World Civilizations to 1600 | HIST 116 World History: A Comparative Survey from the Ancient World to A.D. 1500 |
| World Civilizations Since 1600 | HIST 117 World History: A Comparative Survey from A.D. 1500 to the Present |
| American History to 1877 | HIST 200 History of the United States, a Survey Course: from Colonial Times to 1865 |
| American History 1877 to the Present | HIST 201 History of the United States, a Survey Course: from 1865 to the Present |

**2) SEU’s Associate of Arts in General Education requires 62 credit hours.**

In accordance with the CCRCCA’s Credit Limits for Associate’s and Bachelor’s Degrees (§15-117 Education Article, Annotated Code of Maryland) there is a cap on the number of credits in an Associate’s degree:

*Beginning in the fall 2015 semester, the standard number of credits required for an associate’s degree from a public community college is 60 credit hours unless the degree is defined as more than a two-year degree, or professional accreditation or certification requirements dictate excess credits. The standard number of credits required for a baccalaureate degree from a public senior higher education institution is 120 credit hours unless the degree is defined as a five-year program, or professional accreditation or certification requirements dictate excess credits.*

SEU’s degree requirement exceeds the cap of 60, and it is not offering a professional accreditation or certification. MC offers a similar degree for 60 credits.

**3) SEU’s tuition and fees are higher than in-county tuition and fees at MC.**

SEUs General Education AA will cost students over $8,000 in tuition and fees each year. Montgomery College offers a General Studies AA that costs under $6,000. It is clearly a more affordable degree. In addition, with the Montgomery College General Studies degree, students may complete using only Open Educational Resources. Pursuing an A.A. degree at Montgomery College is clearly a more affordable option for citizens of Maryland.

Thank you for taking the time to consider this matter. We know that you will make the right decision.

Respectfully,



Sanjay Rai, PhD

Senior Vice President for Academic Affairs