



July 23, 2020

Ms. Jaqueline M. Cade, MPA, MA
Education Policy Analyst
Maryland Higher Education Commission
6 N. Liberty Street, 10th Floor
Baltimore, MD 21201

Dear Ms. Cade,

Thank you for your letter of July 17, 2020 advising of the objection by Montgomery College of the renewal of Southeastern University's Associate of Arts (A.A.) in General Education degree offered at Church of the Redeemer, located at 19425 Woodfield Road, Gaithersburg, M.D.

Southeastern University appreciates the concern and shares with the Maryland Association of Community Colleges a commitment to providing comprehensive and affordable education while also ensuring student success. However, the University does not find a basis for the objection filed with the Maryland Higher Education Commission on July 15, 2020.

First and foremost, SEU's AA in General Education is not a newly proposed program. SEU's authorization to offer degree programs in Maryland has been in place, without (negative action) since 2016. Authorization for the AA and General Education came in 2018 as the institution recognized the need for a bridge for our students who had been in the workforce for some period and were interested in returning to school as well as for those who could not complete bachelor level work and needed a suitable exit back into the workforce.

A review of the objection in light of COMAR 13B.02.03.09 – Duplication of the Proposed Program, we also do not find that there is unreasonable duplication of programs.

Speaking to the concerns expressed by Montgomery College and the senior vice presidents for academic affairs and members of the Maryland Association of Community Colleges, we ask that MHEC consider the following:

1. Differentiation of Programs

While the AA in General Education meets the core requirements for a basic liberal arts and sciences degree, which "Ordinarily, (is)... not considered unnecessarily duplicative", this program also fulfills the mission of the institution, our church partner and Maryland constituent needs based upon a common Christian mission. The AA in General Education of SEU and the AA in General Studies offered at MC are at their core quite similar; however, there is a significant difference rooted in the mission of Southeastern University, which is in "Equipping students to discover and develop their divine design to serve Christ and the world through Spirit-empowered life, learning, and leadership." To that end, a majority of SEU's degree programs, including the AA degree, incorporates courses in Spiritual Formation and Christian Responsibility as well as an opportunity to participate in hands-on ministerial practicum experiences. The

AA degree in particular carries 10 hours in Spiritual Formation, 9 hours in Christian Responsibility and the opportunity to participate in 12 hours of hands-on ministerial practicum experiences. This curriculum content is important because the general SEU student is focused on a career path that incorporates Christian values in their vocation, whether in ministerial work within the church or with service organizations throughout the world. With this value added component, SEU is able to meet the needs of the Maryland Christian community in a way that the community colleges are not.

2. Justification for SEU's AA in General Education requirement of 62 credit hours

In the absence of regulations speaking to private/Christian institutions, SEU's AA in General Education is found to be in compliance with the minimum General Education Requirements and distribution of courses specified in the code COMAR 13B.06.01.03 - General Education Requirements for Public Institutions.

We note as well, that 13B.06.01.03.A indicates "institutions have the autonomy to design their general education programs to meet the unique needs and mission" of the institution. Here again we point to the incorporation of Spiritual Formation and Christian Responsibility coursework as well as an opportunity to participate in hands-on ministerial practicum experiences into the degree to adequately meet the career preparation needs of the SEU student as is the intent of the College and Career Readiness and College Completion Act of 2013.

We therefore request the indulgence of the MEHC to allow this credit load to stand.

3. SEU's tuition and fees are higher than in-county tuition and fees at MC

SEU acknowledges that the MC has resources that make it possible to offer in-county tuition at a lower rate than SEU is able. However, in effort to make the degrees offered at SEU extension sites more affordable and to serve the mission of the institution, every extension site student that opts to enroll in a practicum course receives a "practicum scholarship" or credit to their student bill for that course. So, SEU tuition that would normally run \$8,850/yr. at Church of the Redeemer is reduced by scholarship to \$7,080/yr.

4. Need

Our own internal evidence suggests that future employers (e.g. churches and parachurch organizations) are seeking graduates who possess experience in both the rigors of the classroom and in the field. SEU offers students a balanced experience, which demonstrates the importance of both orthodoxy (theory) and orthopraxis (practice). Many program graduates have become leaders within church ministries. This evidence bodes well for the program's design and suggests that future employers are supportive of our integrated model.

On a broader spectrum, the need for the Associate of Arts in General Education degree finds support in the general employment market. According to MD Workforce Development's Long-Term Occupational Projections (2018-2028), there is evidence of growth in the long-term demand in Maryland for individuals with AA degrees where ethics and compassion are paramount including:

Occupational Title	Job Openings due to growth/replacement (2018-28)	% Change in Employment (2018-28)
Occupational Therapy Assistants	432	52.01%
Physical Therapists Assistants	947	41.64%

Preschool Teachers	1,983	17%
Web developers	427	14.27%
Paralegals	953	11.35%

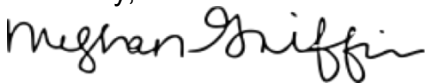
<https://www.dlr.state.md.us/lmi/iandoproj/maryland.shtml>

The Economic Development and Employer Planning system also shows a long-term demand for Religious Workers (all other) in Maryland of 10.9% with the addition of approximately 30 new jobs annually between 2016 and 2026. <https://www.edeps.org/selectoccua.aspx?st=MD>.

Clearly, there is demand in the Maryland workforce for individuals with the AA degree. Where SEU is uniquely positioned is in meeting the demand of the niche of individuals seeking Christian higher education.

Based upon the evidence provided here, SUE respectfully requests the Maryland Higher Education Commission grant approval of our application to renew authorization for the Associate of Arts in General Education

Sincerely,



Meghan Griffin, Ph.D.
Associate Provost and Dean of Unrestricted Education

C: Dr. Kent J. Ingle, President, Southeastern University
Ms. Lisa Barranco Murphy, Compliance Director, Southeastern University

Supplement to Jaqueline Cade:

Southeastern University does not find there is unreasonable duplication of programs with Montgomery College.

While the AA in General Education meets basic core requirements for a basic liberal arts and sciences degree, which "Ordinarily, (is)... not considered unnecessarily duplicative", this program also fulfills the mission of the institution, our church partner and Maryland constituent needs based upon a common Christian mission.

A detailed Analysis and Response to each item in Section 13B.02.03.09 - Duplication of the Proposed Program follows here:

A. *The elimination of unreasonable program duplication is a high priority. Ordinarily, proposed programs in undergraduate core programs consisting of basic liberal arts and sciences disciplines are not considered unnecessarily duplicative. Unreasonable duplication is a more specific concern in vocational/technical, occupational, graduate, and professional programs which meet special manpower needs. The issue of how a proposed program meets an institution's local and State area needs shall be addressed.*

B. *Evidence demonstrating that a proposed program is not duplicative of similar offerings in the State shall be submitted by the institution. At a minimum, this evidence shall be substantiated on the basis that the proposed program to be offered is not unreasonably duplicative of existing programs in a specific geographically proximate location in the State.*

C. *Determination of Duplication.*

(1) *In determining whether a program is unreasonably duplicative, the Secretary shall consider:*

(a) *The degree to be awarded - Associate of Arts (A.A.) in General Education (CIP Code: 24.0102)*

(b) *The area of specialization;*

The AA program is an undergraduate core program consisting of basic liberal arts and science courses with an added component that infuses basic Christian theology, history and traditions such that students are able to develop a Christian worldview.

(c) *The purpose or objectives of the program to be offered;*

The purpose or objectives of the program to be offered: The Associate of Arts (AA) degree includes the core learning components and competencies commonly accepted as foundational for a four-year baccalaureate degree by many colleges and universities. The AA degree is designed for students who desire recognition for completing the two-year prescribed curriculum. In addition, students will be able to demonstrate a basic knowledge of the biblical basis of Christian theology, the history of Christian traditions, and the various expressions of global Christianity.

(d) *The specific academic content of the program;* - See the attached degree program for academic content.

(e) *Evidence of equivalent competencies of the proposed program in comparison to existing programs;* - Note that while a portion of the courses are comparable to those offered by Montgomery College, there are 16 hours of courses required in spiritual formation as well as 12 hours of practicum experience where in the students are afforded the opportunity, for credit, to obtain hands on experience.

And (f) *An analysis of the market demand for the program.*

According to MD Workforce Development's Long-Term Occupational Projections (2018-2028), there is evidence of growth in the long-term demand in Maryland for individuals with AA degrees where ethics and compassion are paramount including:

Occupational Title	Job Openings due to growth/replacement (2018-28)	% Change in Employment (2018-28)
Occupational Therapy Assistants	432	52.01%
Physical Therapists Assistants	947	41.64%
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Web developers	427	14.27%
Paralegals	953	11.35%

<https://www.dlir.state.md.us/lmi/iandoproj/maryland.shtml>

The Economic Development and Employer Planning system also shows a long-term demand for Religious Workers (all other) in Maryland of 10.9% with the addition of approximately 30 new jobs annually between 2016 and 2026. <https://www.edeps.org/selectoccua.aspx?st=MD>

Current opportunities for employment in Maryland for graduates with an AA degree is evidenced by the posting of 42 jobs on www.Christianjobs.com (7.21.20) include: Administrative Assistant, Child Care Center Director, Medical Assistant, Operations Manager, Camp Director, web developer.

Growth in demand across the country for individuals with an AA degree is also found in the US Department of Labor Statistics Occupational Projections for 2018-28 (numbers in thousands)

Occupational Title	2018 Employment	2028 Employment	% Change in Employment (2018-28)	Job Openings due to growth /replacement (2018-28)	Median Annual Wage 2019	Typical Entry Level Education	Work Experience in a Related Occupation	Typical on the Job Training
Religious Workers, All other	60.4	63.4	5%	8.3	\$31,630	Assoc.	None	None
Physical Therapist Assistants	98.4	125	27%	16.5	\$58,790	Assoc.	None	None
Occupational Therapy Assistants	43.8	58.3	33%	7	\$61,510	Assoc.	None	None
Preschool Teachers	523.6	560.5	7%	58.1	\$30,520	Assoc.	None	None
Paralegals	325.7	364.8	12%	40.4	\$51,740	Assoc.	None	None
Web Developers	160.5	181.4	13%	15.1	\$73,760	Assoc.	None	None

<https://www.bls.gov/emp/tables.htm>

(2) The analysis shall include an examination of factors, including:

(a) Role and mission;

As guided by the University's mission "Equipping students to discover and develop their divine design to serve Christ and the world through Spirit-empowered life, learning, and leadership." Southeastern University is anchored in providing education in a Christ-centered, student-focused learning community. Southeastern's global impact is marked by a deep commitment to transforming minds and engaging culture through the integration of faith, learning and service. Each student's divine design is nurtured and unleashed through the investment of faculty and staff, relationships within the community, the rigor of scholarship, diverse learning experiences and the discipline of spiritual formation, which propels students into a lifetime of serving the world in the Spirit of Christ.

(b) Accessibility, in serving this Christ centered mission, accessibility is achieved through education at the main campus in Lakeland, FL, or at one of 137 extension sites across the country either through face-to-face or online delivery. Southeastern University is a participating institution in NC SARA.

(c) Alternative means of educational delivery including distance education;
as above.

(d) Analysis of enrollment characteristics; Students who enroll in the AA degree program are traditional college age students continuing in their learning ladder as well as individuals who have been in the workforce for some period and are interested in returning to school. What is unique about our students is that they desire a program that integrates faith in learning and is provided in a Christian learning community.

(e) Residency requirements;

Per University policy, the final 25 percent of their credits must be earned at Southeastern University.

(f) Admission requirements; Per the SEU Admissions Policy Handbook have not changed since last approval:

Section 8.6.: The necessary requirements to be submitted as part of the application to a Southeastern University Extension Site include:

- Completed online application. The application for admission to any of our extension sites is found at the following link: www.seu.edu/apply/ext.
- Christian Character Reference
- Biographical Essay. The essay should be at least one full page, double spaced, 12 point font.
- Official High School Transcripts
- SAT/ACT Scores
- Official College Transcripts (if applicable)

and

(g) Educational justification for the dual operation of programs broadly similar to unique or high-demand programs at HBIs. - N/A

Student ID: _____
 Student Name: _____
 Adviser Name: _____

Catalog: 2020-2021 Southeastern University -
 Unrestricted Education Catalog
 Program: Associate of Arts - Extension Site/Regional
 Campus
 Minimum Credits Required: _____

Associate of Arts - Extension Site/Regional Campus

Foundational Core - 50 Credit Hours

Spiritual Formation - 10 Hours

College and Christian Calling

Course Name	Credits:	Term Taken	Grade	Gen Ed
CORE 1001 - COLLEGE AND CHRISTIAN CALLING	Credits: 1			

Old Testament Elective

Course Name	Credits:	Term Taken	Grade	Gen Ed
BIOT 1433 - OLD TESTAMENT INTERPRETATION	Credits: 3			

New Testament Studies

Course Name	Credits:	Term Taken	Grade	Gen Ed
BINT 1533 - NEW TESTAMENT INTERPRETATION	Credits: 3			

Christian Studies

Course Name	Credits:	Term Taken	Grade	Gen Ed
THEO 2123 - CHRISTIAN THOUGHT AND PRACTICE	Credits: 3			

Christian Responsibility - 9 Hours

Course Name	Credits:	Term Taken	Grade	Gen Ed
CORE 1503 - PERSONAL STEWARDSHIP	Credits: 3			
CORE 2013 - HUMAN DIVERSITY AND CHRISTIAN COMMUNITY	Credits: 3			
THEO 3123 - INTRODUCTION TO ETHICS	Credits: 3			

Intellectual and Practical Skills - 12 Hours

Course Name	Credits:	Term Taken	Grade	Gen Ed
DCOM 1433 - FUNDAMENTALS OF SPEECH	Credits: 3			
ENGL 1133 - ENGLISH COMPOSITION I	Credits: 3			
ENGL 1233 - ENGLISH COMPOSITION II	Credits: 3			

Mathematics (select one):

Course Name	Credits:	Term Taken	Grade	Gen Ed
MATH 1213 - COLLEGE ALGEBRA	Credits: 3			
MATH 1223 - QUANTITATIVE REASONING	Credits: 3			
MATH 1313 - TOPICS IN MATHEMATICS	Credits: 3			
MATH 1323 - EXPLORATIONS IN MATHEMATICS	Credits: 3			

MATH 2023 - INTRODUCTION TO PROBABILITY AND STATISTICS	Credits: 3			
CTIS 3433 - DATA MANAGEMENT AND ANALYSIS	Credits: 3			
Engaging Human Culture and the Natural World - 19 Hours				
History Elective (select one):				
Course Name	Credits:	Term Taken	Grade	Gen Ed
HIST 1033 - WORLD CIVILIZATION TO 1600	Credits: 3			
HIST 1043 - WORLD CIVILIZATION SINCE 1600	Credits: 3			
HIST 2013 - AMERICAN HISTORY TO 1877	Credits: 3			
HIST 2023 - AMERICAN HISTORY 1877 TO PRESENT	Credits: 3			
PPOL 2433 - UNITED STATES AND NEVADA CONSTITUTIONS	Credits: 3			
*Required for Nevada students.				
Humanities Elective (select one):				
Course Name	Credits:	Term Taken	Grade	Gen Ed
HUMS 2033 - THEATRE APPRECIATION	Credits: 3			
HUMS 2233 - INTRODUCTION TO HUMANITIES	Credits: 3			
MUSC 1013 - ELEMENTS OF MUSIC	Credits: 3			
Literature Elective				
Course Name	Credits:	Term Taken	Grade	Gen Ed
ENGL 2133 - WI: INTRODUCTION TO LITERATURE	Credits: 3			
Behavioral Science Elective (select one):				
Course Name	Credits:	Term Taken	Grade	Gen Ed
PSYC 1133 - INTRODUCTION TO PSYCHOLOGY	Credits: 3			
PSYC 1233 - PERSONAL AND SOCIAL ADJUSTMENT	Credits: 3			
Social Science Elective (select one):				
Course Name	Credits:	Term Taken	Grade	Gen Ed
SSCI 2033 - HUMANS IN SOCIETY	Credits: 3			
SSCI 2233 - MARRIAGE AND FAMILY	Credits: 3			
BBUS 2203 - INTRODUCTION TO ECONOMICS	Credits: 3			
Natural Science Elective with lab (select one):				
Course Name	Credits:	Term Taken	Grade	Gen Ed
NSCI 1034 - LIFE SCIENCE LECTURE/LAB	Credits: 4			
NSCI 2704 - INTRODUCTION TO FORENSIC SCIENCE (LECTURE & LAB)	Credits: 4			
BIOL 1334 - ESSENTIALS OF HUMAN ANATOMY & PHYSIOLOGY LECTURE/LAB	Credits: 4			
General Electives - 12 Credit Hours				
Total Program Hours - 62 Credit Hours				