

Maryland Higher Education Commission

Administrative Procedures Guide

Academic Program Review

Updated February 2024

Table of Contents

- I. Background and Purpose
 - A. What is this document?
 - B. Who should read this document?
 - C. Who to contact?
- II. Regulations, Statutes, and Helpful Resources
- III. Proposal Submission and Payment: How to
- IV. Proposal Types: Directions
 - A. New Academic Programs/ Standalone Certificates, New Area of Concentration, New Degree Level and Substantial Modifications
 - B. Non-substantial Modification (Curriculum)
 - C. Certificate Within Existing Program
 - D. Title Change
 - E. CIP/ HEGIS Code Change
 - F. Modality Change
 - G. Discontinue Program
 - H. Suspend/Reactivate Program
 - I. Closed Site and Prison Education Programs (PEP)
 - J. Articulation Agreement
 - K. Health Occupation Shortage and Statewide Programs
 - L. Off-Campus Program and Offer Program at Regional Higher Education Center
 - M. Cooperative Degree Program
- V. Duplication and Objections
- VI. Circulated Proposals
- VII. Action Letters
- VIII. Academic Program Inventory (API)

Section I: Background and Purpose

A. What is This Document?

This document provides guidance on the administrative procedures for Academic Program Review. It serves as a reference manual to support institutions throughout the program review process by summarizing applicable requirements, outlining key procedures, and offering practical information to ensure compliance with relevant regulations.

It is important to know that this guidance is not the same as a law, statute, or regulation.

Statutes are laws passed by a legislature; regulations are laws passed by a government agency that expand on statutes.

This guidance is intended to supplement, not replace, the official regulations. All users of this document should also consult the applicable regulations. Each section includes links to the Code of Maryland Regulations (COMAR) to facilitate reading the regulations alongside this guidance. In the event of any conflict or inconsistency between the regulations and the guidance provided here, the regulations take precedence.

B. Who Should Read This Document?

This guidance is intended for all institutional personnel involved in the Program Review process, including administrators, staff, and faculty. Students may also consult this document to gain a better understanding of the process and its expectations.

C. Who to Contact?

For inquiries please contact our program review email: acadprop.mhec@maryland.gov.

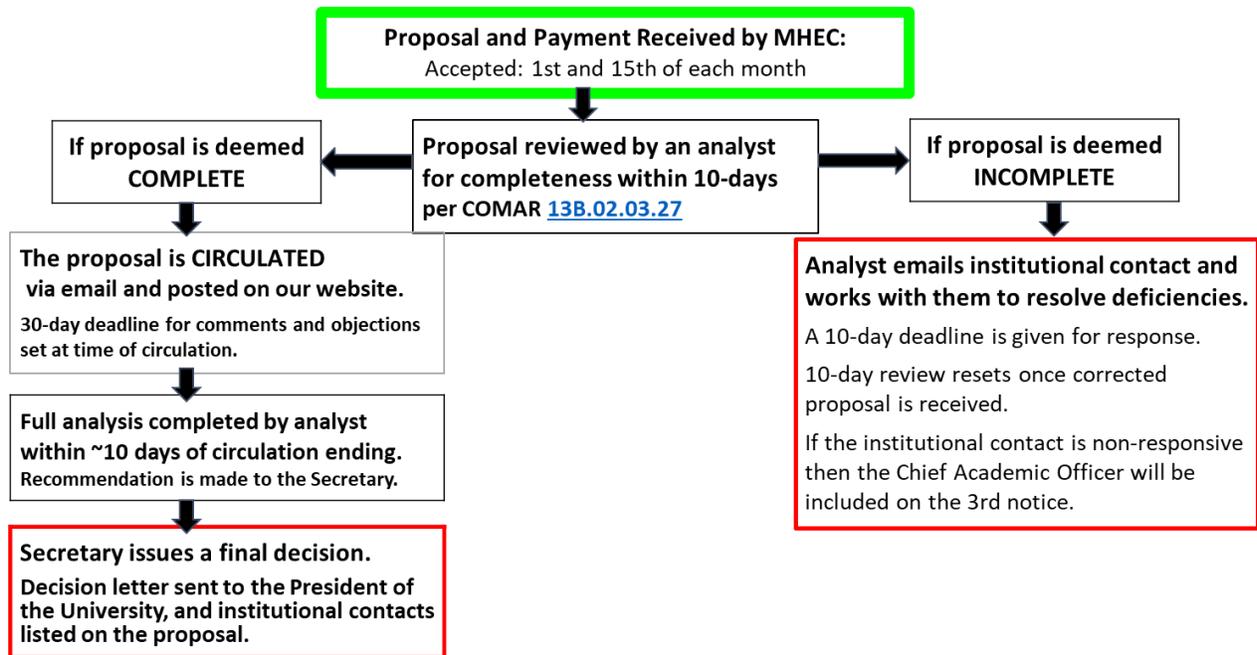
Section II: Regulations, Statutes, and Helpful Resources

- A. [COMAR 13B.02.02.00](#): Minimum Requirements for In-State Degree-Granting Institutions
- B. [COMAR 13B.02.03.00](#): Academic Programs — Degree-Granting Institutions
 - a. *This chapter sets forth requirements for program development by all institutions of higher education, including public, independent, private for-profit, 2-year, and 4-year institutions.*
- C. Education Article, [Title 11](#), Annotated Code of Maryland
- D. Program, Certificate, and Degree Level Requirements
 - a. Graduation and Credit Requirements: [COMAR 13B.02.02.16](#)
 - b. Degree Programs and 60-credit exception: [COMAR 13B.02.03.24](#)
- E. Relevant Definitions in Regulation: [COMAR 13B.02.02.03](#) and [COMAR 13B.02.03.02](#)
- F. [Academic Program Inventory](#)
- G. [New Academic Programs Under 30-Day Review](#)
- H. [Academic Program Proposals](#)
- I. [New Academic Programs, Degrees, Substantial Modifications, and Stand-Alone Certificate Programs](#)
- J. Proposal Types and Submission Requirements (See Table 1)
- K. [New Program or Substantial Modification Cover Sheet](#)
- L. [Non-substantial Modification Cover Sheet](#)
- M. [Maryland State Plan for Higher Education](#)
- N. [2020 Objection Process and Requirements](#)
- O. MHEC Academic Program Review Training (will be updated bi-annually)
 - a. [FAQ'S](#)
 - b. [Training Slides](#)
 - c. [Articulation Agreement Review Checklist](#)
- P. [Office of Research and Policy Analysis](#)
 - a. Trends in Fall Enrollment by Program (E-TRENDS)
 - b. Trends in Degrees and Certificates By Program (D-TRENDS)
- Q. [Commission Meetings](#)

Section III: Proposal Submission and Payment

- A. An institution submits a proposal using guidelines in accordance with State regulations found in [COMAR 13B.02.03](#). Proposals must be submitted electronically to acadprop.mhec@maryland.gov on the 1st and 15th of each month. If the 1st or 15th occurs on a weekend or holiday, please submit the following business day. Each proposal should only include one action (for example; one proposal cannot request a CIP Code and Title change).

Figure 2: Program Proposal Completeness Check



B. [Fee Schedule](#)

- a. Relevant Regulation: [COMAR 13B.02.03.02-1](#)

C. MHEC does not accept credit card payments at this time. Payments can be made by:

- a. Checks made payable to the Maryland Higher Education Commission and sent to the attention of Program Review, Academic Affairs.

- b. RSTARS transfer. Information is outlined below:

RSTARS Transfer
Agency Number: R62
PCA Number: 01423
AOBJ Number: 6657
Transaction Code: 410

D. Proposal Withdrawals:

- a. When an institution chooses to withdraw a proposal they should do the following:

- i. Submit a request to withdraw the proposal on institution letterhead, signed by the appropriate officiant.

E. Refund process

- a. Once a withdrawal letter is received by the institution:
 - i. MHEC will process the refund. This process includes a review of the request by the MHEC Departments of Academic Affairs, Finance, and Administration. Finally, it is sent to the Comptroller's Office for final processing and release of funds.

F. Implementation Date Calendar (for proposal cover sheets):

- a. FALL – Approximate Start ~Sept 1 = implementation date for Fall stop accepting with July 1 submissions.
- b. SPRING – Approximate Start ~January 24 = implementation date for Spring stop with December 1 submissions.
- c. SUMMER – Approximate Start ~ May 28 = implementation date for Summer stop accepting with April 1 submissions.

Section IV: Proposal Types

Table 1 below may be used to identify proposal requirements by proposal type. Institutions should use the below table to find their desired proposal type. An “X” identifies what is required for the proposal.

Table 1: Proposal Types and Submission Requirements

Proposal Type	Proposal Requirements								
	Fee	Cover Letter	Sub-mod Cover Sheet	Non-sub Cover Sheet	Program Modality Request Form	Memorandum of Understanding (MOU) or Department of Corrections letter	Full Proposal (A-P) or abbreviated proposal	Articulation Agreement	30-Day Circulation
New Academic Programs/ Standalone Certificates, New Area of Concentration, New Degree Level and Substantial Modification	X	X	X				X	X	X
Non-substantial Modification (Curriculum)	X	X		X					
Certificate Within Existing Program	X	X		X			X		
Title Change	X	X		X					
CIP/ HEGIS Code Change		X		X					
Modality Change	X	X		X	X				
Discontinue Program		X		X					
Suspend/Reactivate Program		X		X					
Closed Site and Prison Education Programs (PEP)	X	X		X		X			
Health Occupation Shortage and Statewide Programs	X	X		X			X		
Off-Campus Program and Offer	X	X	X				X		X

Program at Regional Higher Education Center									
Cooperative Degree Program	X	X	X			X	X		X

A. **New Academic Programs/ Standalone Certificates, New Area of Concentration, New Degree Level, and Substantial Modifications:** An institution shall submit a [complete program proposal](#) for the following actions:

- i. Establish instruction leading to a formal award in a subject area in which the award is not presently authorized,
 - ii. Establish an instructional program in a subject area which will offer a degree at a different degree level than presently authorized,
 - iii. Establish a new major by combining coursework from two or more existing degree programs, or
 - iv. Establish a degree that is of a different type than that presently authorized.
 - v. Change more than 50 percent of the major coursework in an existing program;
 - vi. Establish a new area of concentration within an existing program, and/or;
 - vii. Offer an existing program as an off-campus program
- b. Proposals for undergraduate programs that require new resources and all proposed graduate programs within these categories are circulated to the higher education community for 30 days and are subject to Institution/Secretary comment and/or objection.

Table 2: New Academic Programs/ Standalone Certificates, New Area of Concentration, New Degree Level, and Substantial Modifications Regulations

Statutory Authority of the Commission Regarding Academic Program Review, Approval, and Recommendation	
New Programs	COMAR 13B.02.03.03D
New Area of Concentration within an existing program	COMAR 13B.02.03.03E.(3)
Delegation of Program Responsibility	COMAR 13B.02.03.04
Long-Term Goals	COMAR 13B.02.03.05
Criteria for Program Review	COMAR 13B.02.03.06

Mission and Planning Priorities	COMAR 13B.02.03.07
Need for the Proposed Program	COMAR 13B.02.03.08
Duplication of the Proposed Program	COMAR 13B.02.03.09
Adequacy of Curriculum Design, Program Modality, and Related Learning Outcomes	COMAR 13B.02.03.10
Faculty Resources	COMAR 13B.02.03.11
Library Resources	COMAR 13B.02.03.12
Physical Facilities and Instructional Equipment	COMAR 13B.02.03.13
Finances	COMAR 13B.02.03.14
Adequacy of Provisions for Evaluation of Programs	COMAR 13B.02.03.15
Minority Student Access	COMAR 13B.02.03.16
Low Productivity Programs	COMAR 13B.02.03.17
Cooperative Programs	COMAR 13B.02.03.18
Public Institutions — Transfer and Articulation	COMAR 13B.02.03.19
Off-Campus Programs	COMAR 13B.02.03.20
Distance Education	COMAR 13B.02.03.22
Consultant Review	COMAR 13B.02.03.23
Degree Programs	COMAR 13B.02.03.24
Certificate Programs	COMAR 13B.02.03.25

Steps in the Program Review Process	COMAR 13B.02.03.27
Review by The Commission	COMAR 13B.02.03.28

- c. A complete proposal shall address all of the following areas found [here](#) in the provided template.
- d. Areas of emphasis:
1. Section D: Reasonableness of Program Duplication - If MHEC sees a possibility of duplication that is not addressed in the proposal, it will be considered insufficient and sent back for correction. This applies to proposals for new academic programs, new areas of concentration, new stand-alone certificates, off-campus programs, substantial changes to degree and certificate programs, substantial changes to areas of concentration, cooperative programs, and new program offerings at regional higher education centers. MHEC uses the [Academic Program Inventory](#) (API) and the [Graduation and Enrollment Trends Reports](#) to analyze program duplication internally.

*Analysts perform searches by program title and CIP code to identify potentially duplicative programs. We encourage institutions to also use these tools when preparing their proposals. Further curriculum analyses are performed when necessary to determine duplication.
 2. Section G - Adequacy of Curriculum - If the student will graduate with any specialized certification or licensure please be sure to cite proper board approvals in the proposal.
 3. Section H: Articulation Agreements - per [COMAR 13B.03.02.19](#) proposals for new bachelor's degree programs, substantial modifications to existing bachelor's degree programs, and substantial modifications to existing associate degree programs must include:
 - a. A proposed articulation agreement with at least one community college; **or**
 - b. Justification for why an articulation agreement is not feasible or applicable.
 4. Section I: Faculty - Per [COMAR 13B.02.03.11 \(F\)](#) "Adjunct and part-time faculty are an important and necessary component of

some programs. Except in circumstances to be determined by the Secretary, at least 50 percent of the total semester credit hours within the proposed program shall be taught by full-time faculty.” Also, see [COMAR 13B.02.02.17](#).

- a. Helpful Resource for Proposal Submissions: [Faculty Resources Table](#).

5. Section L: Adequacy of Financial Resources with Documentation - MHEC provides the two tables required for this section ([Table 1: Resources and Narrative Rationale](#) and [Table 2: Program Expenditures and Narrative Rationale](#)). If expenditures exceed resources at any point in the financial table a rationale/justification is required. Figures must be inputted in each cell. Dashes, words, or blanks are not accepted.

- e. **Substantial Modifications (Curriculum):** An institution shall submit a [complete full program proposal](#) for a substantial modification to change more than 50 percent of the major coursework (program requirements) in an existing program. This proposal should include an explanation of the modifications being made including the proposed credit changes.
 - i. Relevant regulation: [COMAR 13B.02.03.03E](#).
 - ii. Only program requirements are counted in a credit in and credit out basis to determine the 50% threshold and electives *if* the total number of elective credits the student must take to graduate changes.
 - iii. Modifications do not include course title changes, course designator changes, or program outcome/ objective changes.
- f. An MHEC analyst's submission to the Secretary for review of the proposal includes:
 - (1) A 10-day memo outlining potential program duplication in the state, a description of the program or changes proposed, the implementation date, and expected enrollment information.
 - (2) A 30-day memo for circulating to the higher education community to allow for comments and or objections.
 - (3) A detailed analysis of the proposal against the COMAR requirements including a review of the market supply/ demand in the state, and the analysts informed recommendation to the Secretary.
 - (4) The final action letter is then drafted based on the Secretary’s decision. The information reflected in the letter is what is used to update the API.
 - (5) If a comment and/or objection is received then further analysis is also submitted specifically addressing the comment and/or objection.

B. Non-substantial Modification (Curriculum): Non-substantial modifications are considered any credit change to the total program requirement credits that is 50% or less of the total program credits.

- a. Relevant regulations: [COMAR 13B.02.03.03E](#) and [COMAR 13B.02.03.02-1](#)
- b. Only program requirements are counted in a credit in and credit out basis to determine the 50% threshold and electives *if* the total number of elective credits the student must take to graduate changes.
- c. Modifications do not include course title changes, course designator changes, or program outcome/ objective changes.
- d. Figure 3 below is helpful to show curriculum changes in program proposals.

Figure 3: Program Modification Chart

OLD Program Requirements	Credits	Removed, Changed, or Added	NEW Program Requirements	Credits
Total OLD Program Requirements			Total NEW Program Requirements	

e. After review for compliance with [COMAR 13B.02.03.03E](#), an MHEC analyst submits to the Secretary for review:

- (1) An internal memo confirming the proposed modifications fall under the 50% threshold, and the institution's rationale for the change.
- (2) A recommended action to the Secretary and draft action letter.

C. Certificate Within Existing Program: An institution must submit an abbreviated proposal to offer a certificate within an existing program.

- a. Relevant regulation: [COMAR 13B.02.03.25D](#).
 - i. A program proposal for a new certificate in an existing degree program must include the four items found [here](#).
- b. Proposals must designate a single-parent program. For example, if an institution wishes to offer a Lower Division Certificate (L.D.C.) in Network Management the institution could identify that their Bachelor of Science (B.S.) in Cybersecurity will provide the curriculum for the certificate program.

- i. COMAR does not state a requirement for how many courses must come from the existing program. MHEC has determined that all courses must come from a single existing program.

Figure 4: Certificate Within and Existing Program



- c. In our review, MHEC uses an institution's most recently published catalog to determine if all the courses are included in the parent program and therefore considered a certificate within an existing program. If a course(s) listed is not found in the catalog the institution can:
 1. Provide an updated catalog that shows the course(s) do draw from the parent program.
 2. Process a [non-substantial modification](#) to add the course(s) to the parent program. Once approved the certificate within an existing program proposal can be processed.
 3. Re-submit the certificate proposal as a [stand-alone certificate](#). This can be processed upon receipt.
 4. Update the proposed curriculum to include only courses that draw from the parent program as listed in the institution's most recently published catalog.
- d. Certificates within may have different HEGIS and CIP codes from the parent program.
- e. After reviewing for compliance with [COMAR 13B.02.03.25D](#) an MHEC analyst submits to the Secretary for review:

- (1) An analysis confirming the certificate programs centrality to the institution's mission, market supply and demand data, curriculum design, and adequacy of faculty resources.
- (2) A recommended action to the Secretary and draft action letter.

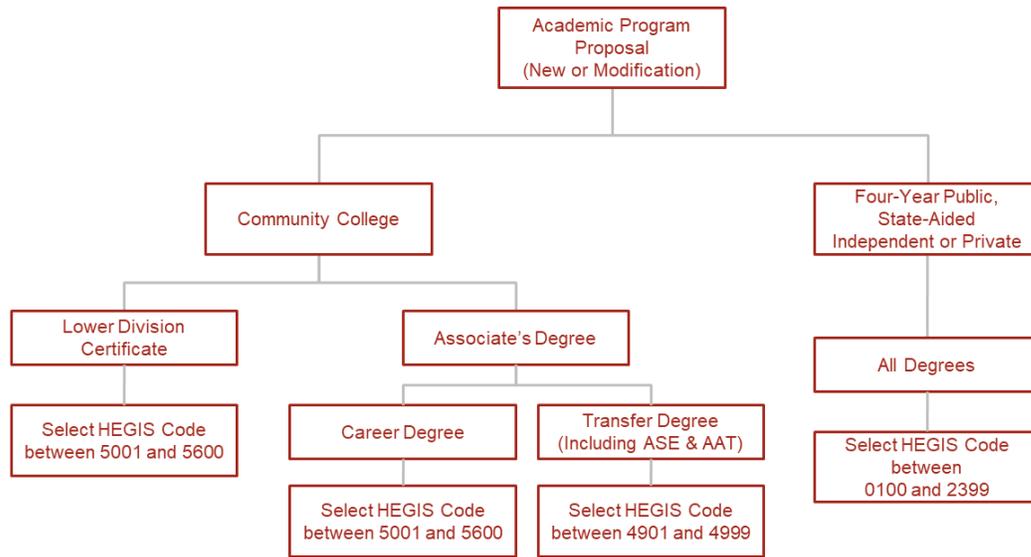
D. **Title Change:** An institution must indicate the existing and proposed titles and a detailed justification for the proposed title change.

- a. Relevant regulation: [COMAR 13B.02.03.03E.\(4\)](#)
- b. After reviewing against the [COMAR 13B.02.03.03E.\(4\)](#) requirements an MHEC analyst submits to the Secretary for review:
 - (1) An internal memo that includes the current and proposed title and the institution's rationale for this change, and a recommendation on whether the title change sufficiently advertises the program.
 - (2) A recommendation to the Secretary. The draft action letter will include the program's current and proposed title. This letter is used to update the API.

E. **CIP/ HEGIS Code Change:** An institution must indicate the existing and proposed codes and a detailed justification for the proposed code change.

- a. Relevant regulation: [COMAR 13B.02.03.02-1](#)
- b. [MHEC HEGIS List](#)
- c. [National Center for Education Statistics \(NCES\): The Classification of Instructional Program \(CIP\) User Site](#)
- d. MHEC reserves the right to assign codes in conjunction with MHEC's Office of Research and Policy Analysis. MHEC will communicate with institutions when a different code is required for a program than the codes proposed. MHEC will ensure the code(s) being requested align with the curriculum and learning objectives of the program.
- e. HEGIS codes for Community Colleges are always 49 and above. If the program proposal indicates the intention of the program is for students to transfer to a 4-year institution then MHEC will encourage the use of a 49 HEGIS code.
- f. An Area of Concentration (AoC) must have the same CIP and HEGIS as the parent program.

Figure 5: HEGIS Code Designation



Codes 1101, 1102, 1103, 1104, 1105, 1106, 1107, 1108, 1109, 1112, 1199 may (currently) be used for Community Colleges. Code 4900 may (currently) be used for University of Maryland Global Campus upper division certificates (degree sought=30). 9099 is a placeholder for undeclared students, it should never be assigned as a code in a program.



g. After review for compliance with [COMAR 13B.02.03.02-1](#) an MHEC analyst submits to the Secretary for review:

(1) An internal memo confirming the current code and the proposed code and the institution's rationale for the change.

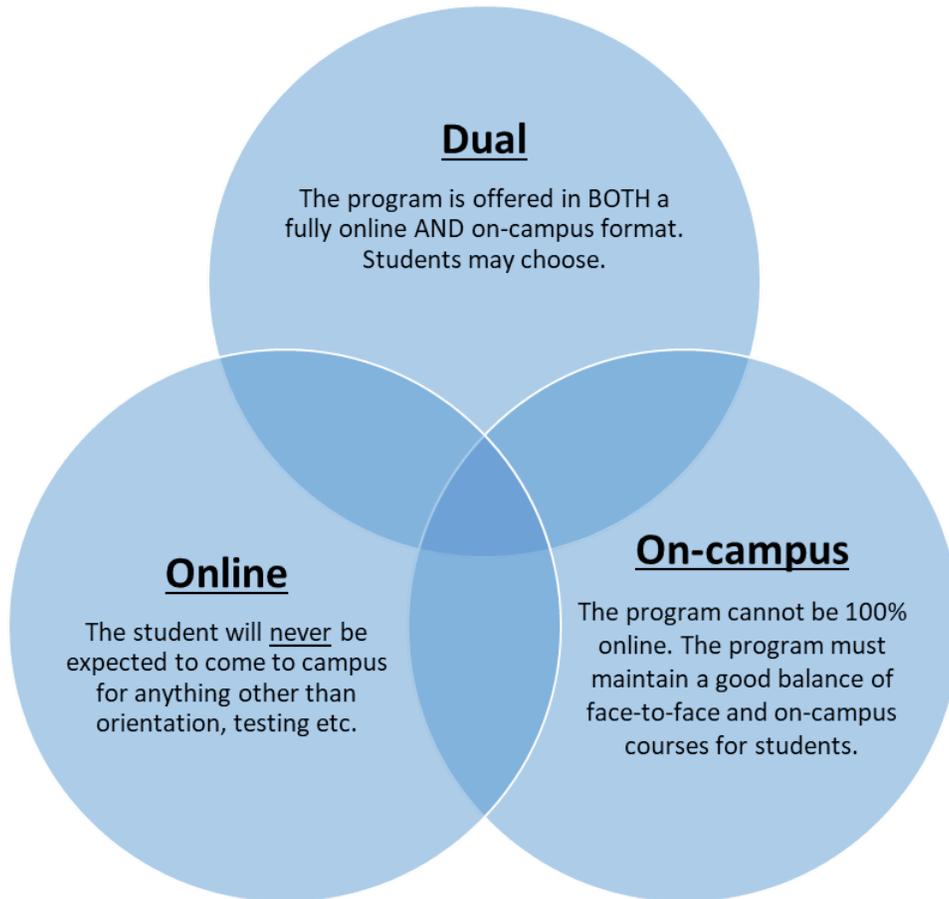
(2) A recommended action to the Secretary. The action letter will reflect the program's previous code and the new code. The final action letter will be used to update the API.

F. **Modality Change:** An institution must submit a change in [Program Modality Request Form](#).

a. Relevant regulations: [COMAR 13B.02.03.29](#) and [COMAR 13B.02.03.22](#)

b. When considering a program modality: [COMAR 13B.02.03.02](#) defines online, distance education, and on-campus programs. MHEC uses the student perspective.

Figure 6: Modality Determination



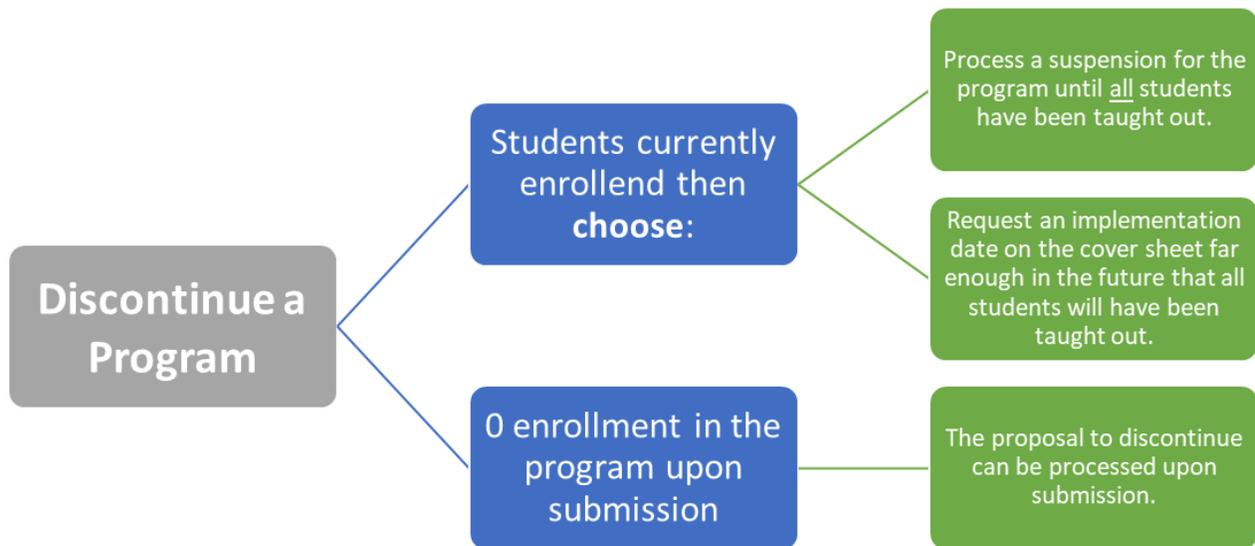
- c. After review for compliance with [COMAR 13B.02.03.29](#) an MHEC analyst submits to the Secretary for review:
 - (1) An internal memo confirming the current modality and the proposed modality. This will include the institution's rationale for the change.
 - (2) A recommended action. The final action letter will reflect the program's previous modality and the new modality which will be used to update the API.

G. **Discontinue Program:** An institution must submit a justification for the proposed discontinuation.

- a. Relevant regulation: [COMAR 13B.02.03.03H](#).
- b. According to [COMAR 13B.02.03.03I](#): Institutions may discontinue a program at any time. However, for this request to be deemed complete:

- i. Check [E-TRENDS](#) to ensure there has not been any recently reported enrollment in the program (NOTE: AoCs do not show up on E-TRENDS. MHEC requires institutions to self-report enrollment for AoC's).
- ii. If E-TRENDS or the institution cannot confirm zero enrollment MHEC will request that the institution remains in suspension/process a suspension for the program rather than discontinue OR request an implementation date on the cover sheet far enough in the future that all students will have been taught out. MHEC will update the API with this request at the beginning of the proposed implementation semester.
- iii. These steps will ensure that when reporting to MHEC on the enrolled students the institution does not receive an error message.

Figure 7: Discontinuation Cycle¹



- c. After reviewing for compliance with [COMAR 13B.02.03.03H](#) an MHEC analyst submits to the Secretary for review:

(1) Recommended action. The final action letter will be used to update the API.

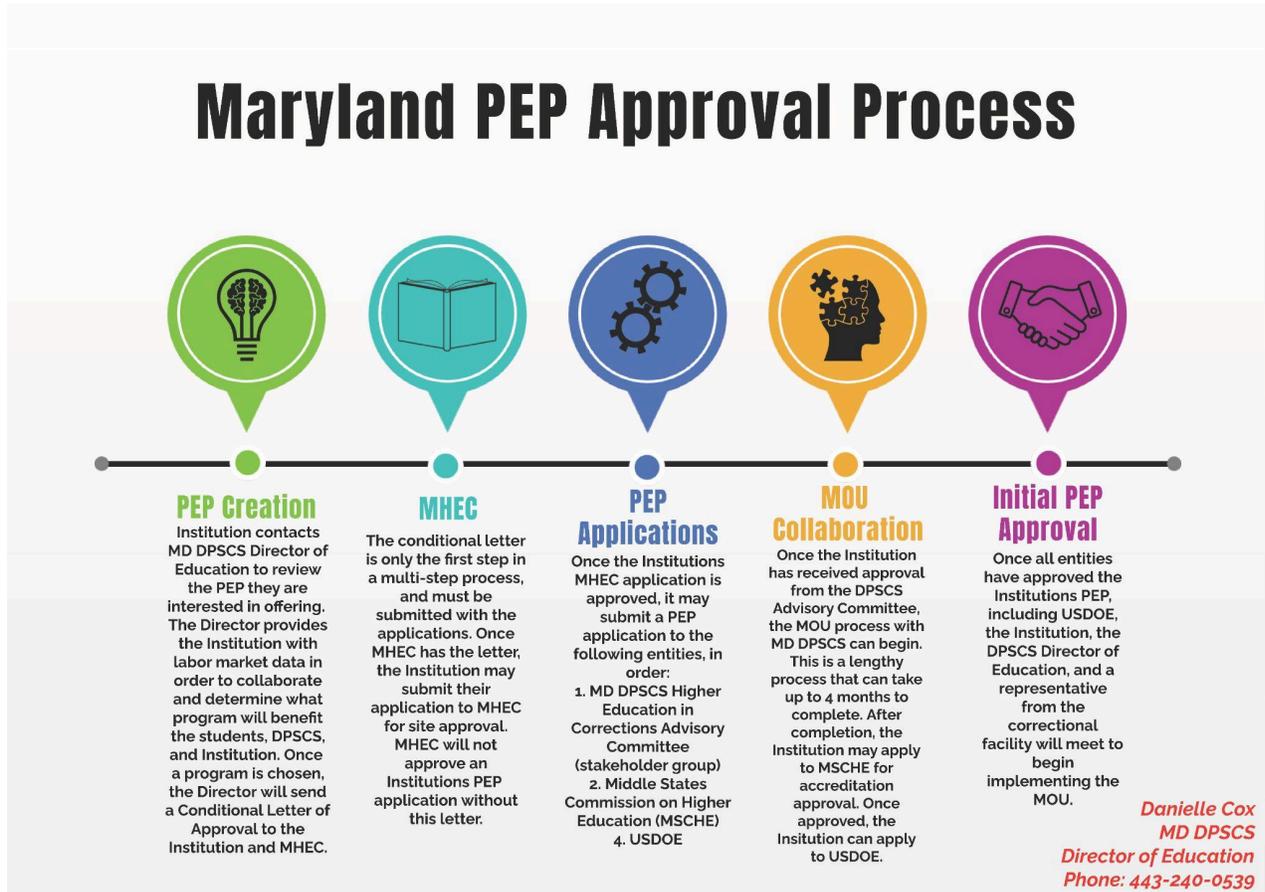
H. Suspend/ Reactivate Program: An institution must submit a justification for the proposed suspension/reactivation.

- a. Relevant regulation: [COMAR 13B.02.03.03H](#).
- b. An institution may suspend a program for up to 3 years.
 - i. After a 3-year period, the institution shall notify the Secretary in writing if the institution will discontinue or reactivate the program.

¹ If institutions request an implementation date in the future: MHEC will update the API with this request at the beginning of the proposed implementation semester. This will ensure MHEC reporting does not receive an error when they attempt to report on students' enrollment for a deactivated program.

1. No new students may be admitted into the program during this period.
 2. The catalog and other official publications shall indicate the official status of the program.
 3. If the program is discontinued currently enrolled students shall be given the opportunity to satisfy degree requirements.
 - ii. To reactivate the program: MHEC will check if the institution suspended the program with the agency within the last 3 years by:
 1. Reviewing the internal Program Review Tracking Log
 2. If a suspension request is not found, MHEC will clarify with the institution and state:
 - a. MHEC internal records do not indicate a request for suspension. MHEC will request further information on when the institution informed the Commission of the program suspension.
 - iii. If after the 3-year suspension period, an institution does not notify the Secretary of their decision to continue or discontinue the program, then to reactivate the program a [full program proposal](#) with a [fee](#) will need to be submitted.
 - c. After review for compliance with [COMAR 13B.02.03.03H](#) an MHEC analyst submits to the Secretary for review: (1) Recommended action to the Secretary (draft action letter) which will be used to update the API.
- I. **Closed Site:** A letter of notification shall describe the program(s) to be offered and affirm that there is access to library resources and adequate faculty resources ([Faculty Resources Table](#)) consistent with the scope and nature of the offerings. Institutions must also include a memorandum of understanding (MOU) with the site where the courses will be offered.
- a. Relevant regulations: [COMAR 13B.02.03.21](#)
 - b. Approvals are done by site, not programs. (All programs should have already been approved to be offered at the institution). All programs proposed to be offered at a single closed site will be listed on the same action letter. If the program will be offered in an online format this should be specified in the MOU and on the [proposal cover sheet](#).
 - c. **Prison Education Programs** go through the Closed Site process for approval. Institutions must submit a recent (2023 or later) letter from the Department of Corrections and an implementation date no sooner than two years from the date of submission. Figure 8 below describes the full approval process.

Figure 8: Maryland PEP Approval Process



- d. After review for compliance with [COMAR 13B.02.03.21](#) an MHEC analyst submits to the Secretary for review:
 - (1) An internal memo confirming that adequate library and faculty resources for the closed-site program were proven to exist.
 - (2) Recommended action to the Secretary including a draft action letter.
- J. **Articulation Agreement:** Per [COMAR 13B.02.03.19](#) an articulation agreement between an in-state community college and an in-state 4-year institution is required to be submitted with all proposals to:
 - a. Offer a New Bachelor’s degree program
 - b. Substantially modify an existing Bachelor’s Degree
 - c. Substantially modify an existing Associate’s degree program.

Relevant Regulations: [COMAR 13B.02.03.19](#) and [COMAR 13B.06.02.13](#)

[Articulation Agreement Review Checklist](#)

After review for compliance with [COMAR 13B.02.03.19](#) an MHEC analyst submits the agreement to the Secretary for review. Once approved by the Secretary, accurate and complete Articulation Agreements will receive an action letter from MHEC.

MHEC Contact: Brittany Martin - brittany.martin1@maryland.gov

K. Health Occupation Shortage and Statewide Programs: Specific to Community Colleges.

- a. For Statewide Designation Programs an institution must submit a proposal that includes information on:
 - i. Maximization of student access to programs;
 - ii. The ability of the college to accommodate additional students;
 - iii. The need for additional students to sustain the program;
 - iv. The unit cost of the program;
 - v. Uniqueness of the program; and
 - vi. Current labor market demand for graduates of the program in the region.
- b. Relevant regulation: [COMAR 13B.02.03.26](#)
- c. [Designated Health Occupation Shortage Programs](#)
- d. [Designated Statewide Programs](#)
- e. Health Occupation Shortage includes a check of the Maryland Department of Health resources to determine if the program supports a designated health occupation.
- f. After review for compliance with [COMAR 13B.02.03.26](#) an MHEC analyst submits to the Secretary for review:
 - (1) An analysis of statewide need.
 - (2) Recommended action to the Secretary including a draft action letter.

L. Off-Campus Program and Offer Program at Regional Higher Education Center: See [COMAR 13B.02.03.20](#) for proposal requirements.

- a. Relevant regulations: [COMAR 13B.02.03.02](#) and [COMAR 13B.02.03.20](#)

- b. After review for compliance with [COMAR 13B.02.03.20](#) an MHEC analyst submits to the Secretary for review:
 - (1) A 10-day memo outlining potential program duplication in the state, a description of the program or changes, the implementation date, and expected enrollment information.
 - (2) As required, a 30-day memo for circulating to the higher education community
 - (3) A detailed analysis of the proposal against the [COMAR 13B.02.03.06](#) requirements, and market supply/ demand in the state
 - (4) Recommended action to the Secretary including a draft action letter.

M. Cooperative Degree Program: The proposed program shall be planned by representatives from each cooperating institution. Identical proposals for each institution shall go through the normal program approval procedures for the institutions and segments, including formal approval and recognition by each governing board. An MOU between or among cooperating institutions must also be provided.

- a. Relevant Regulations: [COMAR 13B.02.03.18](#)
- b. Proposal requirements are identical to [COMAR 13B.02.03.06K](#).
- c. After review for compliance with [COMAR 13B.02.03.18](#) an MHEC analyst submits to the Secretary for review:
 - (1) A 10-day memo outlining potential program duplication in the state, a description of the program or changes, the implementation date, and expected enrollment information.
 - (2) As required, a 30-day memo for circulating to the higher education community.
 - (3) A detailed analysis of the proposal against the [COMAR 13B.02.03.06](#) requirements, market supply/ demand.
 - (4) Recommended action to the Secretary including a draft action letter.

Section V: Duplication and Objections

- A. Under the current statutory framework, formal objections and/or comments may be filed only for:
- a. Proposed undergraduate programs that require new resources.
 - b. All proposed graduate programs.
- B. A justified objection must be based on one of the four criteria below and include the detailed data and information required.
- (1) Inconsistency of the proposed program with the institution's approved mission for a public institution of higher education and the mission statement published in the official catalog of a private nonprofit institution of higher education;
 - (2) Not meeting a regional or statewide need consistent with the State Plan for Higher Education;
 - (3) Unreasonable program duplication which would cause harm to the State or students attending institutions of higher education in the State; or
 - (4) Unnecessary program duplication in violation of the State's equal educational opportunity obligations under State and federal law.
- C. Institutions are also welcome to submit comments regarding a proposed program. A comment letter is not considered an objection. An objection letter must clearly state that the institution is objecting to the proposed program and which of the four criteria applies. Both comments and objections must be received within the 30-day circulation period. MHEC will not consider comments or objections received outside of that timeframe.
- D. [Duplication of the Proposed Program](#): Eliminating 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 that meet special manpower needs.
- E. [Determination of Duplication](#) includes the factors considered to identify unreasonable duplication.

Table 3: Objection Steps and Timeline

Objection Step	Timeline
Objection received	During the 30-day circulation period
Send objection to proposing institution/ post objection to website	Within one business day of receiving the objection

Determine if the objection is justified	Within three business days of receiving an objection
Schedule institution meetings and request a 60-day extension	Within three business days of receiving an objection
MHEC staff submits objection analysis and recommendation materials to the Secretary for review	No later than 15-business days of 60-day decision deadline
Send decision/ determination letters to institutions	No later than five business days from the decision deadline
Institution requests an appeal for a Commission Review	Within 10-days of receiving the decision letter

Section VI: Circulated Proposals

- A. [New Academic Programs Under 30-Day Review](#)
- B. If you would like to be added or removed from the distribution list email the academic program mailbox at acadprop.mhec@maryland.gov.
 - a. It is the institution's responsibility to update MHEC on these contacts.

Section VII: Action Letters

- A. The action letter is sent to the President, contact listed on the proposal cover sheet, provost/chief academic officer, and segment representative of the institution. Institutions are responsible for sharing action letters with contacts not mentioned above.

Section VIII: Academic Program Inventory (API)

- A. [Academic Program Inventory](#) - Complete inventory of academic programs recognized by the Maryland Higher Education Commission.
- B. The title inputted into the API is exactly what is reflected on the cover sheet of a new program proposal or title change (Abbreviations may be used to meet character limits).
- C. For programs approved before 2000 that are not reflected in the API: if the institution, nor MHEC can locate a record of the program approval from MHEC then MHEC will request an approval letter from the segment/institution representative. If this also cannot be provided then MHEC will alternately request a published catalog page from 2000 or earlier reflecting the program. With one of these forms of proof MHEC can then add the program to the API.
- D. If a community college requests a change to an AoC that is not on the API or not correct on the API, MHEC will check to see if the institution previously submitted an AoC conversion request. As per [COMAR 13B.02.03.03-1](#), MHEC allowed Community Colleges to convert sequences to AoCs without going through the program approval process if they did so by June 30, 2017.