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Office of the Provost and Vice President for Academic Affairs

MEMORANDUM

Date: March 21, 2021

To: Dr. James D. Fielder, Jr., Secretary of Higher Education
Maryland Higher Education Commission

From: Dr. Lesia Crumpton-Young
Provost and Senior Vice President for Academic Affairs
Morgan State University

RE: Morgan State University's Objection to the proposal from University of Maryland Global Campus to offer a new academic program - Bachelor of Science (B.S.) in Cloud Computing Systems

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Per the attached document, Morgan State University is submitting an objection in response to MHEC File Number 21030, dated Feb 19, 2021. Specifically, this objection is regarding the new degree proposal submitted by the University of Maryland Global Campus to offer a Bachelor of Science (B.S.) in Cloud Computing Systems.

Thank you for your consideration of our objection. If you need any additional information, please do not hesitate to contact me at lesia.young@morgan.edu or (443)885-3350.

c: Dr. David Wilson, President, Morgan State University
Dr. Farzad Moazzami, Interim Assistant Vice President for Academic Affairs, MSU
Dr. Hongtao Yu, Dean, School of Computer, Mathematical and Natural Sciences, MSU
Ms. Julie Goodwin, Esq., General Counsel, MSU
Dr. Emily Dow, Assistant Secretary for Academic Affairs, Maryland Higher Education Commission

Morgan State University's Objection to the Proposal from University of Maryland Global Campus for a New Academic Program Bachelor of Science (B.S.) in Cloud Computing Systems

Morgan State University (MSU) has carefully reviewed the proposed B.S. in Cloud Computing System program by the University of Maryland Global Campus (UMGC) and strongly objects to offering this program based on item 3 "unreasonable program duplication which would cause demonstrable harm to another institution," on the MHEC memorandum dated on 2/19/2021.

In 2013, U.S. District Court Judge Catherine Blake ruled in Coalition for Equity and Excellence in Maryland Higher Education et al. v. Maryland Higher Education Commission et al. that the State of Maryland violated the U.S. Constitution by maintaining vestiges of the prior de jure system of segregation in the form of unnecessary program duplication in the public higher education system in the state of Maryland. It is this federal district court Coalition case and the associated constitutional violations which are currently on appeal before the United States Court of Appeals for the Fourth Circuit, and which is the subject of recently passed legislation in the Maryland State Legislature to settle the case and repair some of the harm the program duplication has caused to Morgan State University (MSU) and other Historically Black Institutions (HBIs) in Maryland. Morgan State University objects to this proposal on the grounds that the proposed new B.S. in Cloud Computing Systems by UMGC constitutes an unnecessary and unreasonable program duplication that would cause demonstrable harm to Morgan State University and for which there is no sound educational justification. United States v. Fordice, 505 U.S. 717, 1992.

Morgan State University affirms that this new program would be unreasonably duplicative, harm MSU, and lack an educationally sound justification for duplication. Therefore, Morgan respectfully requests that the proposal to offer this new academic program be denied.

Following are the bases for this objection.

1. Morgan State University received approval from MHEC to offer a B.S. in Cloud Computing degree program on-campus and via distance education (online) on 1/23/2020. Since the approval, Morgan has invested tremendous resources in developing a workforce-oriented curriculum working with industry partners (including Amazon AWS, Microsoft Azure, Google, Oracle, etc.) [1]. Morgan began offering courses [2] in January 2020 and formally launched the Cloud Computing program in fall 2020. **The proposed new B.S. degree**

program in Cloud Computing Systems at UMGC will do demonstrable harm to Morgan State University.

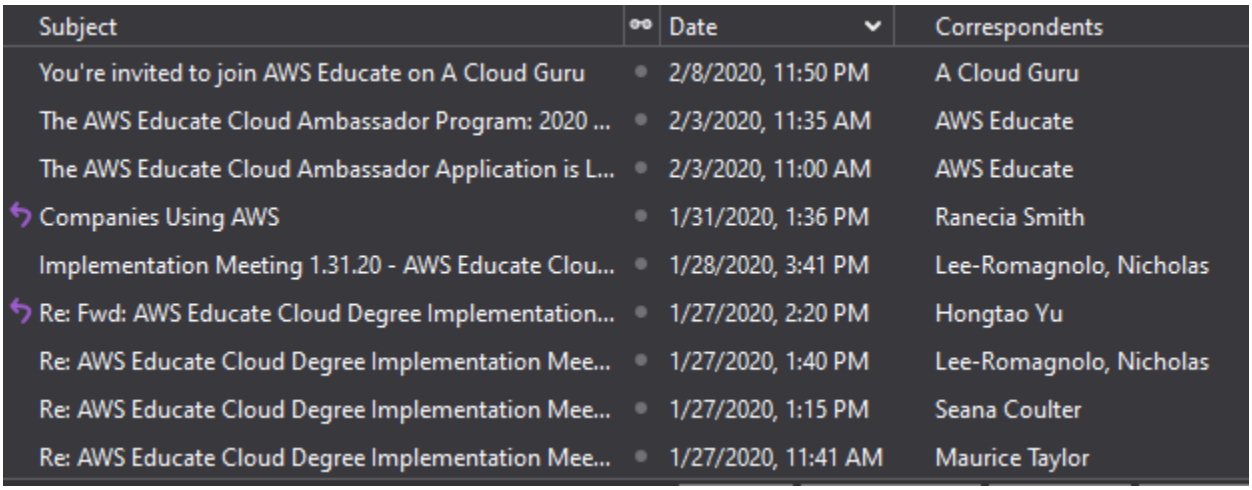
2. In Section D, "Reasonableness of Program Duplication," of the UMGC proposal, UMGC proposes a "conceptually distinct" cloud computing program (p12), but Table 6 (p13-14) has no obvious evidence to support the claims. **Morgan State University affirms that this new program would be unreasonably duplicative.**
3. The proposal states, "No single institution is going to adequately respond to the scale of this unmet demand (p12)." Regardless of whether this ultimately proves to be true, introducing a second cloud computing program at this early stage would deny Morgan the opportunity to establish and develop its program.
4. As for the CIP code, the proposal seems to use a different code than Morgan's, but when reading the details, both programs cover computing systems, hardware and software components, software, and databases [3]. In fact, the UMGC proposal's designation of computing as one of more than ten major study areas within the program is flawed. The notion that cloud computing is a broader area that includes computing itself is logically inaccurate.
5. The UMGC program proposal purports to have a better pedagogy and learning model with a "learn by doing" approach (p14). The approved Morgan proposal describes its learning approach as a: "Project-based hands-on learning approach that integrates the latest cloud computing tools, services, and methods" (section A.1 of the Morgan proposal). **Morgan State University affirms that this new program would be unreasonably duplicative.**
6. "Ten of the 11 UMGC courses in the major directly address cloud-related certifications" (p14). While connections between courses and certificates are good, most scholars across academia agree that using certificates to replace a rigorous curriculum is disadvantageous, as students learning under such circumstances lack foundational knowledge. The Morgan cloud computing program has close ties with the certificates but does not use certificates to replace learning the fundamentals. For example, at an AWS conference in Seattle, a high school female student was featured for her self-taught approach and passed all three AWS certificates. Even so, she never learned the basics of operating systems, networks, or databases, not to mention enterprise software architecture as required by the UMGC proposal. Those three certificates are three courses in the proposal CMIT 326, CCS 356, and CMIT 426 (p18-19). The so-called "uniqueness" and "advantages" of the proposed program demonstrate a lack of rigor.

In summary, the UMGC proposes a Cloud Computing Systems program that unreasonably duplicates the B.S.in Cloud Computing program at MSU that has only just started. Other than using industry certificates to essentially replace 10 of the 11 cloud major courses, which most academic scholars do not recommend, the program lacks distinct features.

Morgan State University objects to the approval of this program on the grounds that it constitutes unreasonable duplication of its B.S. in Cloud Computing program and would cause demonstrable harm to Morgan State University.

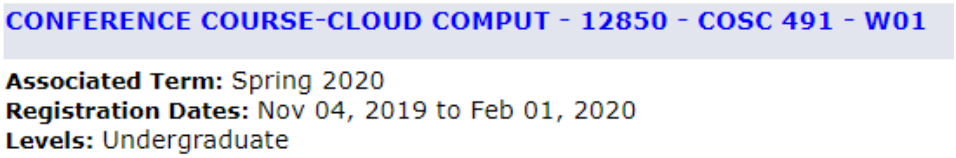
References

[1] Email communications between Morgan faculty and AWS in late January and early February 2020.



Subject	Date	Correspondents
You're invited to join AWS Educate on A Cloud Guru	2/8/2020, 11:50 PM	A Cloud Guru
The AWS Educate Cloud Ambassador Program: 2020 ...	2/3/2020, 11:35 AM	AWS Educate
The AWS Educate Cloud Ambassador Application is L...	2/3/2020, 11:00 AM	AWS Educate
Companies Using AWS	1/31/2020, 1:36 PM	Ranecia Smith
Implementation Meeting 1.31.20 - AWS Educate Clou...	1/28/2020, 3:41 PM	Lee-Romagnolo, Nicholas
Re: Fwd: AWS Educate Cloud Degree Implementation...	1/27/2020, 2:20 PM	Hongtao Yu
Re: AWS Educate Cloud Degree Implementation Mee...	1/27/2020, 1:40 PM	Lee-Romagnolo, Nicholas
Re: AWS Educate Cloud Degree Implementation Mee...	1/27/2020, 1:15 PM	Seana Coulter
Re: AWS Educate Cloud Degree Implementation Mee...	1/27/2020, 11:41 AM	Maurice Taylor

[2] Cloud Computing course offered at Morgan Computer Science Department in spring 2020



CONFERENCE COURSE-CLOUD COMPUT - 12850 - COSC 491 - W01

Associated Term: Spring 2020
Registration Dates: Nov 04, 2019 to Feb 01, 2020
Levels: Undergraduate

[3] CIP Codes

11.0103: A program that focuses on the design of technological information systems, including computing systems, as solutions to business and research data and communications support needs. Includes instruction in the principles of computer hardware and software components, algorithms, databases, telecommunications, user tactics, application testing, and human interface design. (Morgan Program)

11.0902: A program that prepares individuals to design and implement enterprise software systems that rely on distributed computing and service-oriented architecture, including databases, web services, cloud computing, and mobile apps. Includes instruction in data management, distributed and cloud computing, enterprise software architecture, enterprise and cloud security, mobile systems and applications, server administration, and web development. (UMGC Proposal).