



November 22, 2021

Office of the Provost

8000 York Road
Towson, MD 21252-0001

James D. Fielder, Ph.D.
Secretary of Higher Education
Maryland Higher Education Commission
6 N. Liberty Street
Baltimore, MD 21201

Dear Secretary Fielder:

I am writing to register Towson University's objection to Stevenson University's proposal to offer a Bachelor of Science in Healthcare Management.

Code of Maryland Regulations (COMAR) 13B.02.03.27B(3)(c) forms the basis for our objection, that this proposal constitutes 'unreasonable program duplication which would cause demonstrable harm to another institution'.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melanie L. Perreault'.

Melanie L. Perreault, Ph.D.
Provost and Executive Vice President for Academic and Student Affairs

MLP/wrf

cc: Dr. Antoinette Coleman, Associate Vice Chancellor, Academic Affairs, USM
Dr. Clare Muhoro, Associate Provost for Academic Affairs
Dr. Lisa Plowfield, Dean College of Health Professions
Dr. Tab Uhrich, Associate Dean College of Health Professions



This letter asserts Towson University’s (TU) objection to Stevenson University’s new degree proposal for a Bachelor of Science (B.S.) in Health Care Management (HCMN) as detailed in the November 1, 2021 notification issued by the Maryland Higher Education Commission (MHEC). Stevenson’s planned on-campus HCMN B.S., offered less than 20 miles from TU’s main campus, directly competes with TU’s existing on-ground HCMN B.S program. Approving Stevenson’s program would create unnecessary duplication pitting Stevenson’s generalist model against TU’s HCMN program with its distinctive AACSB accredited business minor as a program requirement. In addition, the Association of University Programs in Health Administration (AUPHA), has certified the TU HCMN B.S. degree program as meeting standards of academic excellence in providing students with industry recognized skills in managing human and material resources to achieve healthcare organizational objectives.

Moreover, Stevenson’s nearby offering, if approved, would occur as college enrollments continue to decline, to say nothing of anticipated but uncertain COVID borne enrollment challenges (including shifts to all online programs, e.g., UMGC). If approved, Stevenson’s program would emerge just as TU is poised, funded, and resourced with three new tenure-track faculty lines (advertised now in open searches) to expand its traditional on-ground HCMN model at TU in Northeastern Maryland (TUNE) in the Fall of 2022. This unreasonable duplication of traditional face-to-face programs would harm TU and other institutions that are striving to attract students in the face of pressing student pipeline problems and declining graduation rates (see Table 1). Consider also, in the case of TUNE, how the loss of even a few students might make a difference between a realistically small but pedagogically meaningful cohort and a skeleton cadre in name but without critical mass. TU’s HCMN program’s AUPHA certification requires that two faculty lines be dedicated to the TUNE HCMN program regardless of student enrollments.

- **Existing Health Care Management Programs in the State of Maryland with inherently duplicative objectives.**

As Stevenson University has noted, the state of Maryland currently has four undergraduate Health Care Management programs, two of which are delivered primarily face-to-face at TU and UBalt. Both on-ground programs are AUPHA certified with curricula based on 10 recommended course content areas. Three of the four Maryland brick-and-mortar programs show slightly declining graduation rates as of 2019, and this continued for TU in 2020. Although data is not yet fully available, all indications are that enrollments and graduation rates continued to decline in 2020-2021 for the face-to-face programs in Maryland (Table 1).

Table 1. Maryland Health Care Administration related programs graduation rates.

Institution Name	Degree Title and Type	2016	2017	2018	2019	2020
Towson University	Health Care Management,	115	104	104	99	87

	B.S.					
University of Baltimore	B. S. in Health Management	47	69	49	48	
University of Maryland Global Campus	Health Services Management, B.S.	97	161	190	229	
Washington Adventist University	B.S. & Health/Fitness Management (Health Administration)	21	13	5	10	
TOTAL All/ On-Ground		280/ 183	347/ 186	249/ 158	386/ 157	

It is also important to consider that there are 56 Health Care Management, Health Administration, Public Health Administration, Health Services Management, or closely related programs that are offered in adjacent states including Delaware, Pennsylvania, Virginia, and West Virginia and the District of Columbia. Fourteen of these are AUPHA certified, two are IACBE accredited and five are accredited by the Accreditation Council for Business Schools and Programs. So, on the face of it, and as this analysis shall show, Stevenson University’s proposed program does not appear to offer any unique advantages over the existing programs in the state and surrounding areas. This seems to be a fair assessment based upon comparing the TU and SU programs’ proposed courses, shared HEGIS and CIP codes, and respective accreditation criteria.

- **Further detailed evidence that TU’s existing program has similar curriculum and program objectives are evident in the title of the program, degree level, area of specialization, HEGIS and CIP codes, Accreditation/Certification standards, and course content.**

Both Towson University’s HCMN program and Stevenson University’s proposed program share the same HEGIS and CIP codes: HEGIS:120200 and CIP: 51.0701. The CIP Code refers to health and administrative management the proposed and current domains for both TU’s and SU’s respective programs. TU does not have a Health Services General CIP code (51.0000) which some may see as implied in SU’s proposal’s characterization of the TU HCMN B.S. as a generalist degree despite its core business focus (see Table 2), although this is probably not Stevenson’s intent. Regardless the NCES definition of CIP 51.000 follows:

Definition: A program that prepares individuals to develop, plan, and manage health care operations and services within health care facilities and across health care systems. Includes instruction in planning, business management, financial management, public relations, human resources management, health care systems operation and management, health care

resource allocation and policy making, health law and regulations, and applications to specific types of health care services.

Further, the SU Table (#2) below and in the SU proposal, Stevenson seems to be positioning their program as distinctive from other Maryland programs by virtue of an indicated but undefined “business focus” as opposed to the “generalist focus” it attributes to TU’s program. In this connection, they elaborate that their BS is based on courses that would be taught by faculty from Brown School of Business and Leadership which is accredited by the International Accreditation Council for Business Education (IACBE). The latter requires that a “minimum of 50% of their coursework be in the traditional areas of business **education** [emphasis added],” that the SU program would meet after graduating its first cohort.

This IACBE accreditation, then, seems to be the special focus that SU believes distinguishes its program from other purportedly “generalist” programs, which, again, is how SU identifies TU’s HMCN program. The IACBE is the newest of the three business accrediting entities (1997) but is closely similar to the much older and more widely accepted and prestigious AACSB (1916) accreditation which approves the TU HCMN program’s embedded business administration (BUAD) minor. This minor constitutes 50%, or 24 of 48 didactic units in the TU major. Again, TU’s overall HCMN B.S. is AUPHA certified, which stipulates “business knowledge and skills,” as a key program focus pursuant to the AUPHA’s Healthcare Leadership Competencies as identified by the Healthcare Leadership Alliance.

Differences in standards between the IACBE accreditation and AUPHA Certification are subtle and not universally acknowledged. The IACBE may slightly emphasize teaching effectiveness, while AACSB accreditation seems more closely associated with larger more research-oriented institutions that places a somewhat stronger emphasis on faculty qualifications. This emphasis is reflected in the high number of doctorates ($n=7$) in the TU HCMN faculty, constituting 74% of the regular HMCN faculty, ($n=9.5$), excluding the three positions now being advertised that require research doctorates (but will, nevertheless teach from 6 to 7 courses). This does not include the doctoral prepared faculty that teach in the very rigorous AACSB accredited Business Department. Regardless, these different accreditation priorities do not seem substantial, although the AUPHA’s research emphasis is modestly reflected in the TU’s HMCN program’s practical curriculum, which offers an Allied Health (AHLT) research methods course to prepare tomorrow’s managers to interpret research that is essential to effective quality enhancing evidence-based management. Additionally, the TU program’s AUPHA certification confirms a strong focus on **education outcomes** and teaching excellence as assessed by university, AUPHA, and Peregrine Global Health Care Administration business competency-based assessment criteria.

In sum, despite nuanced accrediting body differences that are not well noted in the academic or gray literature, it is difficult to discern how the SU program, with its expected IACBE accreditation, materially differs from TU’s AUPHA certified undergraduate degree with its embedded AACSB accredited minor, by accrediting standards, HEGIS, or CIP code alone.

It is even more challenging to discern the thinking behind Stevenson’s characterization of the TU Health Care Management program as “generalist” in nature while seemingly implying that its own

proposed degree is somehow more specialized based on their identification of trifold foci of “Business, Finance, and Strategic Planning” (see Table 2). The information presented below demonstrates that TU’s HCMN program by no means takes a generalist approach, but rather a strongly targeted business approach to preparing industry professionals to lead change and pursue quality.

- **Further evidence of closely similar curriculum and course offerings with a side-by-side comparison of courses and course objectives**

A close comparative review of the respective program’s courses shows few salient differences between the two schools (Table 3). One especially notable difference is Stevenson’s heavy focus on biology and epidemiology, and, to a lesser extent, strategic planning, while SU’s featured “focus” on finance and business (see Tables 2 & 3) seems no more robust, or possibly even less hearty than TU’s Finance focus, based on a close curricular comparison. For example, TU’s

Table 2. SU’s Proposed HCM Program Compared to Similar Programs in the State of Maryland

University	Degree	HCM Program IACBE Accredited	Focus	Student Population and Format
Stevenson University (Proposed)	BS, Healthcare Management	Planned; Eligible upon graduating one set of graduates.	Business, Finance, Strategic planning	Traditional, Face to Face
Towson University	BS, Health Care Management	AUPHA Certified with an AACSB accredited business minor (24 credit hours)	Generalist degree; offers Long-term Care Track	Traditional, Face to Face
University of Baltimore	BS, Health Management	AUPHA Certified	Public Affairs, Health Systems	Hybrid: Working adults; Weekends, Transfer students only
University of Maryland Global Campus	BS, Health Services Management	No	Generalist degree	Online; Entry-level and midcareer professionals.

Washington Adventist University	BS, Health Care Administration	No	Generalist degree	Online, face-to-face, and/or hybrid. Working adults with healthcare experience.
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HCMN program has nine credit hours of finance (FIN 330 and FIN 415) and ACCT 201 Principles of Financial Accounting. In addition, catalog featured finance themes manifest in such courses as TU’s HLTH 207 Health Care Services in the U.S., which has an introductory health economics and reimbursement component. Also, HCMN 413: Services and Housing for the Long-Term Care Consumer, has a finance/reimbursement component. This content compares to SU’s six required credit hours in ACC 140: Financial Accounting and HCM 313: Healthcare Financial Management. It is true, that SU’s proposed course HCM 311 Health Insurance and Managed Care could be counted as a financial course, but these reimbursement related topics are addressed in a range of TU’s HCMN courses including HLTH 207 and HCMN 305 and, again, in HCMN 413. Consider also that both programs offer 9 credit hours in Economics counting TU’s ECON 205 Statistics for Business and Economics, which is the recommended statistics option for those with an interest in the financial aspects of management.

Other similarities are readily apparent or easily mapped in a content analytical crosswalk between the two programs which show a high level of correspondence. See, for example, Stevenson’s HCM 314: Healthcare Organizational Behavior (OB). This is a key focus in TU’s MNGT 361 Leadership and Management (3) as well as HCMN 305 Health Administration. Stevenson’s HCM 212 Healthcare Information Systems comprises a substantial aspect of TU’s HCMN 435 Health Information and Quality Management. And so it goes, but the main point is that the two programs are closely similar even where the Stevenson proposal identifies a particular focus (e.g. business), regarding which, for instance, TU’s AACSB required Business minor speaks for itself.

Table 3. Course content for TU and SU’s respective Health Care Management Programs.

Note: This Table includes the TU HCMN program’s **Long-Term Care (LTC) Track**, which is optional, but contains several courses that are strongly recommended as preferred electives even for majors who do not pursue the track (these courses exhibited an enrollment of 65 HCMN majors in AY 2020-2021. This track is taught and overseen by two Ph.D. faculty, Dr. H. Wayne Nelson (MBA, FGSA), a former state Long-Term Care Ombudsman, and Dr. McSweeney-Feld (a licensed nursing home administrator) who have much experience and national reputations in this field and have published two books and numerous high impact journal articles on LTC and related management and organizational behavior themes. Stevenson’s program does not suggest focused content in this area despite the tsunami of older adults who are strongly affecting the nation’s LTC system as well as entire spectrum of health care services.

Towson University's Major Requirements	48	Stevenson University's Major Requirements	65
COSC 111: INFORMATION AND TECHNOLOGY FOR BUSINESS	3	ACC 140: FINANCIAL ACCOUNTING	3
GERO 101: INTRODUCTION TO GERONTOLOGY	3	ACC 141: MANAGERIAL ACCOUNTING	3
HLTH 207: HEALTH CARE IN THE U.S.	3	BIO 112: PRINCIPLES OF GENERAL BIOLOGY OR BIO 113: GENERAL BIOLOGY I (SR-L)+	3
LEGL 225: LEGAL ENVIRONMENT OF BUSINES	3	BIO 113L: GENERAL BIOLOGY LAB (SR-L)+	1
ENGL 317: WRITING FOR BUSINESS AND INDUSTRY	3	BIO 322: EPIDEMIOLOGY	3
HCMN 305: HEALTH ADMINISTRATION	3	CHS 220: DIVERSITY AND CULTURAL COMPETENCE	3
AHLT 311: HUMAN RESOURCE MANAGEMENT FOR ALLIED HEALTH PROFESSIONALS	3	CMH 210: INTRODUCTION TO COMMUNITY HEALTH (SS)+	3
HCMN 413: SERVICES AND HOUSING FOR THE LONG-TERM CARE CONSUMER	3	EC 201: PRINCIPLES OF MACROECONOMICS (SS)+	3
HCMN 415: FINANCING AND ORGANIZATION OF HEALTH CARE SERVICES IN THE U.S.	3	EC 202: PRINCIPLES OF MICROECONOMICS	3
HCMN 435: HEALTH INFORMATION AND QUALITY MANAGEMENT	3	EC 355: HEALTH ECONOMICS	3
HCMN 441: LEGAL AND ETHICAL ISSUES IN HEALTH ADMINISTRATION	3	MATH 136: INTRODUCTION TO STATISTICS (QL)+	4
AHLT 445: RESEARCH METHODS IN INTERPROFESSIONAL HEALTH STUDIES	3	MGT 210: BUSINESS WRITING (WI)+	3
HCMN 495: HEALTH CARE MANAGEMENT INTERNSHIP	12	HCM 208: HEALTHCARE ETHICS AND LAW	3
Required courses in BUAD Minor:	24	HCM 212: HEALTHCARE INFORMATION SYSTEMS	3

ACCT 201 or ACCT 211: PRINCIPLES OF FINANCIAL ACCOUNTING	3	HCM 310: THEORIES AND PRACTICE OF HEALTHCARE MANAGEMENT (WI)+	3
ACCT 202 or ACCT 212: PRINCIPLES OF MANAGERIAL ACCOUNTING	3	HCM 311: HEALTH INSURANCE AND MANAGED CARE	3
ECON 201 or ECON 203: MICROECONOMIC PRINCIPLES	3	HCM 312: MANAGING HEALTHCARE PERSONNEL	3
ECON 202 or ECON 204: MACROECONOMIC PRINCIPLES	3	HCM 313: HEALTHCARE FINANCIAL MANAGEMENT	3
ECON 205: STATISTICS FOR BUSINESS AND ECONOMICS or MATH 231	3	HCM 314: HEALTHCARE ORGANIZATIONAL BEHAVIOR	3
MKTG 341: PRINCIPLES OF MARKETING	3	HCM 400: PROFESSIONAL SKILLS DEVELOPMENT	3
MNGT 361: LEADERSHIP AND MANAGEMENT	3	HCM 417: HEALTHCARE MANAGEMENT INTERNSHIP	6
FIN 330: ESSENTIALS OF FINANCIAL MANAGEMENT	3		
Total Major Requirements	48	Electives	27
Required BUAD Minor	24	Free Electives	27
Total	72	Total	120
<i>Optional Long-Term Care Track</i>	9		
GERO 350 Physical Health And Aging	3		
HCMN 417 Long-Term Care Ethical Problems	3		
HCMN 419 Long-Term Care Administration	3		
<i>Long Term Care Internship Placement</i>	12		

Table 4. Below presents the required catalog descriptive side-by-side course content comparison the Proposed Stevenson University Curriculum (right column) with the TU HCMN program (left column) to indicate preponderant similarities, and any salient differences (e.g., SU's focus on Biology vs, TU's focus on quality).

Towson University HCMN Program	Proposed Stevenson HCM Program
<p>ACCT 201 PRINCIPLES OF FINANCIAL ACCOUNTING (3)</p> <p>Accounting and financial reporting concepts and the significance of financial accounting information in decision-making. Includes the effects of accounting events on business financial statements; planning and decision-making tools in the operating cycle; and the process of recording and communicating information.</p>	<p>ACC 141 Managerial Accounting (3 Credits)</p> <p>Introduces students to managerial accounting. Students learn how to prepare and use financial information to make internal decisions. Topics include managerial accounting concepts, accounting for manufacturing firms, cost systems, standard costs, segment reporting, profit planning, budgeting, and performance measurement. Prerequisites: A grade of "C" or better in ACC 140 or ACC 215. Must be completed prior to taking this course.</p>
<p>ACCT 202 PRINCIPLES OF MANAGERIAL ACCOUNTING (3)</p> <p>Managerial accounting concepts and the significance of accounting information for managerial decision-making. How managers use information to carry out three essential functions in an organization: to plan operations, to control activities, and to make managerial decisions. Prerequisite: ACCT 201 or ACCT 211</p>	<p>ACC 141 Managerial Accounting (3 Credits)</p> <p>Introduces students to managerial accounting. Students learn how to prepare and use financial information to make internal decisions. Topics include managerial accounting concepts, accounting for manufacturing firms, cost systems, standard costs, segment reporting, profit planning, budgeting, and performance measurement. Prerequisites: A grade of "C" or better in ACC 140 or ACC 215. Must be completed prior to taking this course.</p>
<p>Note: Although TU's strong business focus no longer requires Biology in the major; all HCMN majors must take general education CORE 7/8 which includes either BIO 120 or 190 which are taken by the great majority of HCMN majors</p> <p style="text-align: center;">In addition</p> <p>A preferred elective and LTC track requirement is GERO 350 Physical Health and Aging. Focus on age-related physical changes and health issues commonly experienced by older adults and their families in context of biological</p>	<p>BIO 112: Principles of General Biology (3 Credits) OR BIO 113+</p> <p>Emphasizes the molecular nature of biology and biological principles that are common to all life. Topics covered relate to the physical and biochemical structure and function of cells and cell processes and genetics. Includes additional instruction on content and study skills.</p> <p>Prerequisite: Eligibility for MATH 135 or higher. Corequisite: BIO 113L.</p>

<p>theories of aging, as well as concepts of prevention and wellness; discussion of programming to promote healthy living as older adults. Prerequisite: GERO 101.</p>	
	<p>BIO 113: General Biology I: Cell Biology and Genetics (3 credits) OR BIO 112+ Emphasizes the molecular nature of biology and biological principles that are common to all life. Topics covered relate to the physical and biochemical structure and function of cells and cell processes and genetics. Prerequisite: Eligibility for MATH 135 or higher. Corequisite: BIO 113L</p>
	<p>BIO 322 Epidemiology (3 Credits) Introduces the basic principles and methods of epidemiology. Topics include the function of epidemiology, study designs, and statistical methods used to assess risk related to the health of populations. The course will examine the role of epidemiology in the formation of public health policy. Prerequisites: A grade of C or better in BIO 112 or BIO 113. BIO 113L or BIO 113HL, MATH 136 or PSY 136, and either a 200 level biology course or CMH 210.</p>
<ul style="list-style-type: none"> • <i>Note HCMN didact Course DEI/Cultural diversity content audit below.</i> 	<p>CHS 220 Diversity and Cultural Competence (3 Credits) Explores commonalities and differences in contemporary families and individuals. The course examines the culturally competent provision of counseling and human services when working with individuals of similar and different races, ethnicities, socio economic statuses, religions, sexual orientations, and abilities. Prerequisite: A grade of C or better in CHS 101; PSY 101 or SOC 101 (may be taken concurrently).</p>

<p>HLTH 207 HEALTH CARE IN THE U.S. (3)</p> <p>Analysis of health care demands, cost, supply, and recipients. Analysis of different health care settings and factors such as professionalism, the professional education system, authority structures, ethical responsibilities, and referrals. Emerging policy debate and role of managed care are also explored. Core: The United States as a Nation.</p>	<p>CMH 210 Introduction to Community Health (3 Credits)+</p> <p>Introduces a population perspective on health and evidence based methods to address health concerns of U.S. society. Topics include the role of health services providers, health indicators and disparities, and how health is presented to the public. Prerequisite: ENG 152 or ENG 153 (may be taken concurrently).</p>
<p>ECON 201 MICROECONOMIC PRINCIPLES (3)</p> <p>Economic reasoning of individual choice in household and market decisions. Behavior of firms in competitive and noncompetitive markets, functioning of labor and capital markets, role of the entrepreneur and effects of government policies. Core: Social & Behavioral Sciences.</p>	<p>EC 201 Principles of Macroeconomics (3 Credits)+</p> <p>Examines the basic economic principles of the aggregate economy. Subjects covered include the essentials of aggregate demand and supply, government spending and taxation, national income accounting, analysis of unemployment and inflation, money and banking, fiscal and monetary policy, analysis of economic growth, and an overview of the international economy. Prerequisites: ENG 150/151 and placement in MATH 135 or higher. Must be completed prior to taking this course.</p>
<p>ECON 202 MACROECONOMIC PRINCIPLES (3)</p> <p>Inflation and unemployment--causes and remedies. Money and banking, government spending and taxation. International trade. Core: Social & Behavioral Sciences.</p>	<p>EC 202 Principles of Microeconomics (3 Credits)</p> <p>This course examines the basic economic principles governing the decisions of the economic agent. Topics include product and factor markets, as well as pricing decisions. In addition, government policies and the tradeoff between efficiency and equity are examined.</p>
<p>ECON 202 MACROECONOMIC PRINCIPLES (3)</p> <p>Inflation and unemployment--causes and remedies. Money and banking, government spending and taxation. International trade. Core: Social & Behavioral Sciences.</p>	<p>EC 202 Principles of Microeconomics (3 Credits)</p> <p>This course examines the basic economic principles governing the decisions of the economic agent. Topics include product and factor markets, as well as pricing decisions.</p>

	<p>In addition, government policies and the tradeoff between efficiency and equity are examined.</p>
<p>MKTG 341 PRINCIPLES OF MARKETING (3) Design, distribution, pricing and promotion of goods, services, places, people and causes of both national and international markets. Included is an introduction to strategic and tactical applications of marketing.</p> <p><i>See also HCMN 415 Financing and Organization of Health Care Services in the US.</i></p>	<p>EC 335 Health Economics (3 Credits) Examines how economists explain the health care industry. Topics include the effects of market forces on health care, resource markets, and government health care policy. Supply and demand, market structure, and regulatory concepts will be applied to examine these issues. Prerequisites: A grade of C or better in EC 202. Must be completed prior to taking this course.</p>
<p>ECON 205 STATISTICS FOR BUSINESS AND ECONOMICS I (3) Analysis and presentation of business and economic data; descriptive statistics and statistical inference; measures of central tendency and variability; probability theory; estimation; testing of hypothesis; linear regression analysis. Students who have successfully completed ECON 301 will not receive additional credit for ECON 205. Prerequisite: qualifying score on Math Placement exam or MATH 100 (recommended) or MATH 102 or higher.</p> <p>Or</p> <p>MATH 231 BASIC STATISTICS (3) A non-calculus based introduction to statistics with emphasis on applications. Topics include categorical and quantitative data collection through sampling and experimental design, data description and displays, confidence intervals and hypothesis tests for one- and two-samples, and matched-pairs design; normal and t-distributions; correlation and simple linear regression. Emphasis on interpretations of</p>	<p>MATH 136 Introduction to Statistics (4 Credits)+ Introduces the student to basic data analysis. Methods include data collection and packaging, discriminating between valid and invalid uses of statistics, and elementary methods for decision making. Topics include measures of central tendency and dispersion, elementary probability, probability distributions, interval estimates of parameters, hypotheses testing, correlation, and regression. Course activities include elementary applications of statistics to a variety of disciplines. A TI 83, TI 83 Plus, or TI 84 calculator is required for the course.</p>

<p>results throughout. Substantial use of a computer package as a learning and computational tool. Prerequisite: qualifying score on Math Placement exam or MATH 100 (recommended) or MATH 102 or higher.</p>	
<p>ENGL 317 WRITING FOR BUSINESS AND INDUSTRY (3)</p> <p>Standard written formats used in business and industry, including correspondence, memoranda, and reports. Projects individualized to meet student needs and career interests. Requires grade of C or better to fulfill Core requirement. Prerequisite: ENGL 102 or ENGL 190 or equivalent.</p> <p style="text-align: center;">OR</p> <p>BUSX 301 BUSINESS COMMUNICATIONS (4)</p> <p>Seminar designed to enable students to gain the written and oral communication skills needed in professional business situations and to develop and practice important skills for workplace success.</p>	<p>MGT 210 Business Writing (3 Credits)+</p> <p>Focuses on the purposes, principles, and techniques of business writing. The course provides students with a review of the basics in writing while using a variety of operational workplace writing exercises. Students will apply advanced critical thinking ability and analytical competencies to develop overall writing ability. Prerequisites: A grade of "C" or better in ENG 152 or ENG 153 or equivalent Must be completed prior to taking this course.</p>
<p>HCMN 441 LEGAL AND ETHICAL ISSUES IN HEALTH ADMINISTRATION (3)</p> <p>Examination of legal and ethical issues in the administration of health programs. Emphasis is placed on the impact of cost-containment efforts, quality and malpractice concerns, profit-seeking in health, biomedical advances, and new delivery mechanisms. Offered Fall, Spring, Summer, and online. Prerequisite: HLTH 207 or department consent.</p>	<p>HCM 208 Healthcare Ethics and Law (3 Credits)</p> <p>Discusses ethical issues in healthcare management. Emphasis is placed on comparing and contrasting law and ethics, the impact of cost containment efforts, quality and malpractice concerns and the impact of law on healthcare settings and healthcare delivery. Legal and ethical issues in healthcare will be examined through case studies and analyses of real-world examples, particularly as they relate to diversity, equity, and inclusion. Prerequisites: A grade</p>

<p style="text-align: center;">AND</p> <p>LEGL 225 LEGAL ENVIRONMENT OF BUSINESS (3)</p> <p>Examines the nature and sources of law, the U.S. legal system with emphasis on court jurisdiction, procedure, constitutional law, torts, criminal law, and contracts in general and as they relate to business. Students who have successfully completed BULA 225 will not receive additional credit for LEGL 225.</p> <p style="text-align: center;">RECOMMENDED ELECTIVE OR LTC TRACK REQUIREMENT</p> <p>HCMN 417 LONG-TERM CARE ETHICAL PROBLEMS (3)</p> <p>Applying long term care law, rules, theory and clinical and administrative best practice to the solution of practical ethical problems common in long term care. Prerequisite: HLTH 207 or consent of instructor.</p>	<p>of C or better in ENG 152 or ENG 153 or equivalent. Must be completed prior to taking this course.</p>
<p>HCMN 435 HEALTH INFORMATION AND QUALITY MANAGEMENT (3)</p> <p>Principles and practices of information systems and quality management for health care organizations. Prerequisites: HLTH 207, HCMN 305.</p>	<p>HCM 212 Healthcare Information Systems (3 Credits)*</p> <p>Introduces effective and efficient use of health information technology (HIT) to support the mission of healthcare organizations. Strategic use of health information technology and the ability to manage healthcare information systems enables healthcare administrators to be effective decision makers. In this course, students will learn skills and techniques used to implement and operate marketplace HIT tools to support healthcare organizational objectives and strategies. This course is a broad survey of HIT related topics and introduces students to healthcare business information systems, HIT infrastructure, such as electronic health records (EHRs) and emerging technologies, and privacy laws regarding protected health information.</p>

<p>HCMN 305 HEALTH ADMINISTRATION (3)</p> <p>A survey of current approaches to the theories, practices, and organization of health services administration. Prerequisite: HLTH 207 or department consent.</p> <p>RECOMMENDED ELECTIVE OR AS A LONG-TERM CARE TRACK REQUIREMENT</p> <p>HCMN 419 LONG-TERM CARE ADMINISTRATION (3)</p> <p>Institutional and community based long term care facility administration: Examines laws, rules, and nationally established domains of nursing home and residential care managerial practice within an ethically based philosophy of care.</p>	<p>HCM 310 Theories and Practice of Healthcare Management (3 Credits)*+</p> <p>Examines theories and practices of management in healthcare organization. Students will learn about internal and external forces influencing healthcare system or unit performance and clinical excellence. Analysis of human resources, teamwork, leadership, power, politics, change, quality management, and strategic planning as they impact the role of the healthcare administrator will be incorporated into analyses of healthcare management case studies and application of theory to real world experiences. Prerequisites: A grade of C or better in ENG 152 or ENG 153 or equivalent and MGT 210. Must be completed prior to taking this course.</p>
<p>HCMN 415 FINANCING AND ORGANIZATION OF HEALTH CARE SERVICES IN THE U.S. (3)</p> <p>Financing and organization of health care services, emphasizing managed care philosophies in context of organizational and economic theories. Prerequisites: HLTH 207 and HCMN 305.</p> <p>AND</p> <p>HCMN 413 SERVICES AND HOUSING FOR THE LONG-TERM CARE CONSUMER (3)</p> <p>Financing and regulatory structure for services and housing options for chronically ill, dependent populations in the U.S.; market trends, population health,</p>	<p>HCM 311 Health Insurance and Managed Care (3 Credits)*</p> <p>Examines major issues related to the organization, management, regulation, and outcome measures for health insurance and managed care plans. Provides a foundation in concepts related to private and public sector health insurance/benefit plans, both as provided by employers and government agencies such as Medicaid and Medicare. Areas to be addressed include population care management techniques, diversity and inclusion, provider payment, quality and accountability, cost containment, accountable care organizations, and public policy. Current issues in health insurance and managed care will be examined through case studies and analyses of real world examples. Prerequisites: A grade of C or better in EC 202. A grade of C or better in</p>

<p>reimbursement structures and regulatory policies. Offered spring only. Prerequisite: HLTH 207 or consent of instructor.</p>	<p>ENG 152 or ENG 153 or equivalent. Must be completed prior to taking this course.</p>
<p>AHLT 311 HUMAN RESOURCE MANAGEMENT FOR ALLIED HEALTH PROFESSIONALS (3) Human resource management in health, focus on recruitment, development, performance feedback and conflict resolution.</p>	<p>HCM 312 Managing Healthcare Personnel (3 Credits)* Examines human resources and talent management from a strategic and administrative perspective. Students will conduct analyses of the impact of environmental forces, including state and federal legislation, on healthcare organization and management of healthcare personnel. Performance improvement plans, disciplinary measures, benefits, compensation, and promotion will be examined. Employee satisfaction, dissatisfaction, and turnover will be reviewed. Current issues in healthcare personnel management will be examined through case studies and analyses of real world examples. Prerequisites: A grade of C or better in ENG 152 or ENG 153 or equivalent. Must be completed prior to taking this course.</p>
<p>FIN 330 ESSENTIALS OF FINANCIAL MANAGEMENT (3) Provides an overview of the basic principles of financial management for non-business majors. Provides a basic understanding of finance concepts and an exposure to fundamental financial analysis. Topics covered include financial statements, time value of money, securities characteristics and valuation, capital budgeting and working capital management.</p>	<p>HCM 313 Healthcare Financial Management (3 Credits)* Explores the economics of healthcare from both the health system perspective and the point of care. Budget management, cost benefit analyses, cost containment strategies, and management of fiscal and human resources will be explored. Prerequisites: A grade of C or better in ACC 141, EC 201, EC 202, and MATH 136. Must be completed prior to taking this course.</p>
<p>SEE HCMN 305 AND</p>	<p>HCM 314 Healthcare Organizational Behavior (3 Credits)*</p>

<p>MNGT 361 LEADERSHIP AND MANAGEMENT (3)</p> <p>Experience how leadership impacts organizational culture, strategy, and performance. Topics include making strategic decisions; leading and motivating; building and managing teams; managing communication, conflict, and power dynamics; human resource management; entrepreneurship; international business.</p> <p>Prerequisite: junior/senior standing.</p>	<p>Explores organizational theories, motivation, and leadership behaviors in healthcare settings. Students will learn about effective decision making in groups, influencing others, and the importance of organizational values and diversity. Student activities will include case studies and developing effective organizational strategies in addressing healthcare management and administration problems.</p> <p>Prerequisites: A grade of C or better in ENG 152 or ENG 153 or equivalent. Must be completed prior to taking this course.</p>
<p>See HCMN 305 and HLTH 495 Internship</p>	<p>HCM 400 Professional Skills Development (3 Credits)*</p> <p>Students identify and outline healthcare management career goals, develop customized résumé and cover letter writing skills, research opportunities to become more informed, develop strategic approaches to job searching, and strengthen networking and interviewing skills, including informational interviews. Prerequisites: A grade of C or better in HCM 208 Healthcare Ethics and Law, HCM 314 Healthcare Organizational Behavior, HCM 310: Theories and Practice of Healthcare Management. Co-Requisite: HCM 417: Internship.</p>

<p>HCMN 495 HEALTH CARE MANAGEMENT INTERNSHIP (12 credits) Supervised capstone experience in health care management. Prerequisites: completion of all required courses with 2.00 or higher grade equivalent and permission of department chair. Graded S/U.</p>	<p>HCM 417 Healthcare Management Internship (6 Credits)* Integrates and applies healthcare leadership competencies to professional experiences in healthcare organizations. Students participate in creation of unique products, services, or processes. Students must demonstrate effective teamwork, written, verbal, and interpersonal proficiencies. Prerequisites: A grade of C or better in HCM 208 Healthcare Ethics and Law HCM 313: Healthcare Financial Management, HCM 314 Healthcare Organizational Behavior, HCM 310 Theories and Practice of Healthcare Management. Co Requisite: HCM 400: Professional Skills Development.</p>
<p>AHLT 445 RESEARCH METHODS IN INTERPROFESSIONAL HEALTH STUDIES (3) Basic concepts for understanding and conducting research related to Interprofessional Health Studies. Study of experimental and quasi-experimental designs, quantitative, and qualitative methodologies; literature search and critique; basic statistical procedures for data analysis; and research ethics. Prerequisites: Core 3 Mathematics; junior/senior standing; GERO, AHLT, or HCMN major</p>	
<p><i>Note, although this course is mentioned above it has a strong Quality focus that SU's program does not seem to highlight.</i></p> <p>HCMN 435 HEALTH INFORMATION AND QUALITY MANAGEMENT (3) Principles and practices of information systems and quality management for health care organizations. Prerequisites: HLTH 207, HCMN 305.</p>	

Diversity and Cultural Competence Didactic Content in TU's HCMN courses.
 Although the TU Healthcare Management B.S. program has no course solely dedicated to DEI

and cultural competence, this and DEI related content is an AUPHA program requirement. An audit of this content in the HCMN curriculum yields the following substantive elements in required major courses.

- **HCMN 305: Health Administration**

Lectures and lessons and case studies entail DEI related themes. Lectures, a full text-book chapter reading, and other material describe cultural competency; health equity; and the importance of developing cultural sensitivity as essential to effective health care management. Course projects include a health disparities case study as an action assignment for class discussion and as an introduction to the Purnell model for cultural competence

- **HTLH 207: Healthcare in the U.S.**

Disparities is a recurring theme (e.g., high morbidity and mortality rates in multiple among African Americans) mental health and health literacy disparities are also addressed by multiple methods.

- **HCMN 441: Legal and Ethical Issues in Healthcare Administration**

This course includes a cultural Competency Self-Assessment Assignment where students must write a three page article review relating to cultural competency research or a substantive professional article on a DEI related theme. Recent lecture content has included: a review of Baltimore Healthcare DEI related Ethics cases', the Henrietta Lacks HELA cells case, the Kennedy Krieger lead paint study and the Tuskegee Syphilis Study.

- **HCMN 413 Services and Housing for the Long-Term Care Consumer**

Students have 4 diversity assignments:

1. View and discuss the *Lives Worth Living* video about the disparities movement in the U.S.
2. Complete a Home fit exercise by interviewing either an individual over age 18 living in the community with disabilities or an older community dwelling adult to assess the interviewees capacity to live "independently for life."
3. Complete a set of readings on "Who is the Long-Term Care Consumer?" focusing on the increasing cultural diversity in U.S. long-term care settings.
4. Write an essay comparing U.S. LTC services with those of another country of their choice

- **HCMN 417 Long Term Care Ethical Problems:** Two week-long discussion units with recorded lecture dealing with cultural competence and diversity/disparity issues in LTC: UNIT 9: LBGTI rights to sexual expression in heteronormative environments; Unit 10, Culturally Mindful Care

- **HCMN 419 Long-Term Care Administration,** students cover Federal Survey F-tags with diversity requirements (within the context of resident preferences and rights) such as F-248 Activities, F-309 Quality of Care, F-483 Dietary Services, etc.

Internship competition for student placements

Internship work experience is a substantial requirement for both TU's and SU's programs, although TU's is 12 credit hours versus Stevenson's 6 credit hours. Towson University's HCMN

program partners with a wide range of private and public clinics, hospitals, long-term care facilities, NGOs and a miscellany of other health care work settings throughout Maryland to provide a rich integrative internship experience for the HCMN students' as their final "capstone" semester. It is challenging to find, vet, place, and supervise these critical field-experiences that are required by AUPHA and considered by this certification body as one of TU's strengths. As implied in Table 1 graduation rates, TU has placed 99 and 87 interns in 2019 and 2020 respectively and even those these interns constitute a valued hiring pool for our community partners, a range of socio-economic trends (to say nothing of COVID) has led to fewer much sought-after top-tier work exposure opportunities in Maryland. The situation would only worsen if another HCMN program were approved virtually next door to TU's main campus.

In a related vein, it is not irrelevant to note that Towson University is ranked as the most affordable public universities in Maryland. Our reasonable tuition costs are achieved by many factors, including not having to pay or reimburse internship sites that is a growing trend that could be accelerated by increased competition leading to internship site scarcity. Recently, Towson's HCMN program stopped passing even a small extra expense (\$400) to students by dropping payments to preceptors who find that our students bring value to their organizations after the first several weeks of the internship work.

Suppressing student costs can be challenging, but it is critical, especially in a program like TU's HCMN program where a majority of its students are from underrepresented populations by genetic and ethnic ancestry (see Table 5). These backgrounds can correlate with limited opportunities and economic resources. Achieving success equity in healthcare leadership is a top TU goal. The promise of this initiative can be gauged in HCMN enrollments, average GPA on exit (3.14), and equal graduation rates regardless of student racial/ethnic identity. Nevertheless, health care workforce leadership continues to suffer from a lack of diversity. Student fee increases and other related program expenses may present barriers to underrepresented groups in this critical field of community leadership and service.

In a related note, the TU HCMN program's high (majority) minority representation among declared majors and its diverse doctoral prepared faculty (including one Asian female, and three Black or African American females, with latter two holding program leadership positions) support Maryland's Minority Student Achievement goals (as outlined in COMAER 13B.02.03.05). This growing TU goal-driven trend, can be further leveraged by program growth, as opposed to a possible contraction exacerbated by duplicated efforts in a new local competing and inherently similar program with considerably less robust diversity demographics.

Table 5. TU HCMN program enrollments by Race/Ethnicity

Enrollments by Race/Ethnicity (Fall Census)	2016	2017	2018	2019	2020
Black or African American	97	101	103	115	134
Asian	40	36	30	29	35
Hispanic	17	18	19	15	18

White	133	120	114	118	121
Two or More Races	14	14	14	24	22
Unknown	4	2	2	1	0
Foreign	9	9	12	13	8

Faculty Issues and Competition

Compared to the TU HCMN program the Stevenson program is minimally staffed, although it is a much smaller program. It has one FTE with the possibility of another FTE while the TU program has 9.5 faculty FTE that exceed AUPHA staffing requirements. Stevenson would not meet AUPHA requirements with only one FTE faculty member, however excellent, who is already FTE in their graduate program. So, according to its own proposal, most of the SU program will be taught by non-healthcare business experts. TU takes no solace in the fact that SU plans to hire another healthcare management expert, as this too, represents competition for very scarce doctoral prepared Health Care Management faculty in a region saturated with contracting HCMN on ground programs. Further, as much experience shows, TU has had a hard time finding boundary spanning Health Care Management *Pracademics* (see J. W. Poston) and has lost faculty in the past to Stevenson.

Summary

Towson respectfully but strongly objects to the establishment of another healthcare management program that is virtually next-door and hardly distinguishable in any substantive way from Towson University's Health Care Management B.S. program. Possible curricular exceptions, while minor, include its biological focus and apparent dearth of quality management and population health content (see TU's HLTH 207 and HCMN 413 where population health is being added, but not yet in the course description). The latter are critical areas that HCMN students must have to succeed in our state's total cost of care model of health care delivery and reimbursement. Otherwise, both programs have a business focus, although very differently configured, while TU has a greater healthcare specific balance of faculty expertise.

We believe that the above evidence supports the case that the proposed Stevenson HCM program constitutes an unreasonable program duplication that will harm TU's HCMN program. This is especially true as TU's HCMN program grapples with student (and faculty) pipeline threats, cost containment issues, and ongoing COVID uncertainties while attempting to hire new faculty in order to extend the TU HCMN program to the Towson University in Northeast Maryland Campus. Thank you for considering our position.