

August 19, 2019

Sanjay Rai, Ph.D.
Secretary of Higher Education
Maryland Higher Education Commission
Division of Collegiate Affairs
6 N. Liberty Street, 10th Floor
Baltimore, MD 21201

On behalf of Capitol Technology University, thank you for the opportunity to present and clarify our proposal for a **Bachelor of Science in Aviation Maintenance and Management**. We greatly value your thoughtful and thorough process for program review, and we respect the role that peer institutions play in raising questions during that process.

While the University of Maryland Eastern Shore (UMES) has shared concerns regarding our proposed program, we believe that — when reviewed under Maryland’s revised program approval standards — the evidence shows that Capitol Technology University’s program is not unreasonably duplicative, will serve a distinct student population, and will meaningfully contribute to meeting Maryland’s urgent workforce needs.

We respectfully offer the following clarifications and supporting information.

Workforce Demand

The foundation of our proposal rests on the clear, consistent evidence that the aviation industry faces a serious and growing shortage of qualified aviation maintenance technicians.

- MHEC’s Workforce Analysis: The Commission’s own neutral benchmark — Appendix C, *Emerging Occupations* — projects 12.2% job growth for Aircraft Mechanics and Service Technicians from 2022 to 2032 in Maryland.
- Industry Forecasts:
 - The Aviation Technician Education Council (2024 Pipeline Report) projects that by 2028, the aviation industry will face a shortage of 37,000 aviation maintenance workers in North America, with nearly 20% of certificated mechanics retiring and insufficient new graduates to replace them.
 - Oliver Wyman’s “Not Enough Mechanics” study highlights that by 2027, the shortfall could reach 43,000–48,000 mechanics — as much as 27% below industry demand.
 - Boeing’s Pilot and Technician Outlook anticipates the need for at least 124,000 new aviation maintenance personnel over the next decade.

Taken together, these data points paint a clear and urgent picture: without additional training programs, Maryland and the nation will not meet industry needs.

For this reason, the presence of both a program at UMES and a program at Capitol Technology University is not only justified, but essential. Maryland must expand, not contract, its capacity to train aviation maintenance professionals. Two strong programs will ensure that our State is prepared to meet workforce demand while offering students more choice and opportunity.

Program Duplication and Statewide Benefit

We recognize UMES's concern that Capitol Technology's program may negatively impact its existing B.S. in Aviation Maintenance Management. However, Maryland's revised review process under HB 1244 provides a different framework for analysis — one that considers whether duplication would cause harm to the State or to students attending institutions of higher education in the State. By that definition, no unreasonable duplication exists.

- **Distinct Coding:** Our updated proposal submitted July 10, 2025, lists *HEGIS code 5302.00* and *CIP code 29.0401*. This is a distinct classification, not identical to UMES's program.
- **Geographic Complementarity:** UMES is based in Princess Anne on Maryland's Eastern Shore, serving students in a rural and residential setting. Capitol Technology University, by contrast, is located in Laurel in Central Maryland, drawing primarily commuter students from the Baltimore–Washington corridor. These geographic differences mean the two programs will draw from largely separate student populations.
- **Expanding State Capacity:** The workforce need is so acute that Maryland is best served by expanding capacity across multiple institutions and regions. Concentrating aviation maintenance education in a single program risks creating bottlenecks for both students and employers.

In short, approval of Capitol Technology's program would broaden access, meet demand in Central Maryland, and complement rather than undermine UMES's important program.

Institutional Readiness and FAA Certification

UMES also questioned whether Capitol Technology University is prepared to establish the necessary FAA Part 147 certification infrastructure. We respectfully offer the following information to demonstrate our readiness:

- **FAA Experience:** Capitol Technology has successfully completed FAA certification before, obtaining Part 141 approval for our Professional Pilot Program. We are also in the final stages of securing our Restricted Airline Transport Pilot (R-ATP) approval. These accomplishments show that the University has the experience, expertise, and persistence required to navigate FAA processes.
- **Leadership:** The Aviation Department is chaired by a professional with dual expertise as a certified flight instructor and a Maryland attorney specializing in aviation law. This

combination of regulatory, instructional, and legal experience is rare and uniquely positions the program for success.

- **Technical Expertise:** Capitol Technology has engaged a highly experienced FAA-licensed mechanic holding Airframe and Power Plant certifications as well as Inspection Authority. This individual will lead the development of the Part 147 program infrastructure.
- **Facilities and Partnerships:** The University has secured laboratory space on our campus and at two regional airports. We have invested in the necessary equipment — engines, tools, and computer systems — to ensure students have access to hands-on training with industry-standard resources.

While FAA certification is, by its nature, a rigorous and lengthy process, we are confident in our ability to meet all requirements. Our track record, leadership, and investments demonstrate readiness, and we are committed to completing certification successfully. UMES' concerns regarding certification are not only unfounded but also irrelevant to MHEC's review as part of the State's academic program approval process.

Equity, Access, and Affordability

Capitol Technology University has a long-standing mission of providing opportunity to students from underrepresented backgrounds.

- **Diversity:** We are proud to be a majority-minority institution, with approximately 64% of undergraduates from minority backgrounds and a large share of Pell-eligible students.
- **Access in Central Maryland:** Our Laurel location allows many students to commute, avoiding the costs of room and board and making higher education more affordable. This distinguishes our model from UMES's primarily residential approach.
- **Affordability through Aid:** While our published tuition is higher, the majority of our students receive scholarships, grants, and institutional aid that substantially reduce costs. This makes our programs accessible to a wide range of students, including those from historically underserved communities.

By situating a program in Central Maryland, Capitol Technology University will open the doors of aviation maintenance education to students who might not otherwise have access to UMES due to geography, finances, personal or life circumstances.

Conclusion

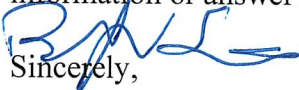
Maryland faces a workforce challenge of national significance: an urgent shortage of aviation maintenance technicians. Meeting this demand requires multiple institutions offering strong, high-quality programs. Capitol Technology University's proposed B.S. in Aviation Maintenance and Management is designed to expand access and help the State meet its workforce, equity, and higher education goals.

We emphasize that our program:

- Responds to a clearly documented State workforce need;
- Avoids unreasonable duplication by serving a distinct geographic and demographic population;
- Is supported by faculty expertise, prior FAA certification experience, and significant institutional investment;
- Expands opportunity for majority-minority, Pell-eligible, and commuting students in Central Maryland; and
- Requires no State funding for development or implementation.

For these reasons, we respectfully request your approval of Capitol Technology University's proposed program.

Thank you for your consideration and for your commitment to strengthening higher education and workforce development in Maryland. We would be pleased to provide any additional information or answer further questions as the review proceeds.



Sincerely,
Bradford Sims
President
Capitol Technology University