UNIVERSITY OF MARYLAND EASTERN SHORE

DIVISION *of* ACADEMIC AFFAIRS

Office of the Provost and Vice President

August 8, 2025

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

Re: Opposition to Capitol Technology University's Proposal to Develop a Bachelor of Science in Aviation Maintenance and Management

Dear Secretary Rai:

We have been informed by the Maryland Higher Education Commission (MHEC) that Capitol Technology University has applied for approval to develop a Bachelor of Science (B.S.) in Aviation Maintenance and Management program. The University of Maryland Eastern Shore respectfully submits this formal objection to the proposed program based on unreasonable program duplication that would cause demonstrable harm to our existing program.

While we appreciate Capitol Technology University's interest in addressing workforce needs in aviation maintenance, their proposal presents several concerns that warrant careful consideration: (1) inaccuracies regarding existing programs in Maryland that suggest incomplete market research; (2) insufficient detail regarding the establishment of required Federal Aviation Administration (FAA) Part 147 certification infrastructure; and (3) substantial program duplication that would negatively impact UMES's recently launched program and the state's investment in aviation maintenance education. These issues collectively raise questions about the necessity and feasibility of the proposed program under COMAR 13B.02.03.09.

Factual Inaccuracies in Capitol's Proposal

Capitol Technology University's proposal contains significant inaccuracies regarding existing programs in Maryland. Specifically, on page 13, Capitol incorrectly states that UMES "does not include FAA A&P certification as part of the degree" and that "Maryland currently lacks a four-

year, bachelor's-level program that combines FAA-certified aviation maintenance training with leadership and management education." These statements are demonstrably false, as UMES offers a Bachelor of Science in Aviation Maintenance Management with embedded FAA Part 147 certification programs—exactly the integrated approach Capitol claims doesn't exist.

Capitol's proposal further states on page 16 that "students who want to pursue careers that require both technical expertise and leadership capabilities must currently navigate multiple programs across different institutions." This directly contradicts UMES's integrated program structure that was approved by MHEC in 2024 and is launching in Fall 2025.

Evidence of Program Duplication

Capitol proposes a substantially identical program in Aviation Maintenance Management to the existing UMES Program:

Program Element	**UMES Program**	**Capitol Program**
Degree Title	Bachelor of Science in Aviation Maintenance Management	Bachelor of Science in Aviation Maintenance and Management
Total Credits	120 credits	121 credits
HEGIS Code	051001	051001 (claimed)
CIP Code	49.0101	49.0101 (claimed)
FAA Certification	Embedded FAA Part 147 Airframe and Powerplant training	Embedded FAA Part 147 Airframe and Powerplant training
Program Structure	Integrated bachelor's degree with FAA certification	Integrated bachelor's degree with FAA certification
Target Market	Baltimore-Washington corridor, statewide	Baltimore-Washington corridor, statewide
Career Outcomes	Aviation maintenance management, A&P certification	Aviation maintenance management, A&P certification

Both programs feature identical core components: general education requirements (40+ credits), aviation management and safety coursework, FAA Part 147 General, Airframe, and Powerplant training modules, capstone/senior project requirements, and industry internship and placement programs. The programs serve identical educational objectives and prepare graduates for the same career pathways in aviation maintenance management, aircraft maintenance operations, and regulatory compliance roles.

Current Program Status and Investment

UMES received MHEC approval for its Aviation Maintenance Management program in 2024 and is launching its first cohort of up to 25 students in Fall 2025. The program required substantial investment exceeding $2.5 million through partnerships with the Salisbury-Wicomico

County Economic Development Corporation, including renovation of specialized training facilities at Salisbury Airport (SBY), acquisition of FAA-required aircraft, engines, and maintenance equipment, hiring of FAA-certified instructional staff, and establishment of industry partnerships with Piedmont Airlines and other regional employers.

UMES has designed the program with initial capacity of 25 students annually, which is scalable based on market demand. However, program duplication would make such expansion less likely by dividing the available student pool. Additionally, UMES has worked collaboratively with the College of Southern Maryland to draft a seamless articulation agreement in concert with their newly proposed program that will allow students to complete our aviation maintenance management program without loss of credit at a significantly reduced cost, demonstrating our commitment to pathway coordination across the state.

Critical Infrastructure and Certification Requirements

Capitol's proposal fails to address the complex requirements for establishing FAA Part 147 certification, which is mandatory for aviation maintenance training. The proposal references contracting with "a certified aviation maintenance training provider" but fails to identify this provider or account for the substantial infrastructure requirements. Currently, UMES operates Maryland's only FAA Part 147 certified training program, other than the program operated by the Pittsburg Institute of Aeronautics in Hagerstown. Establishing new Part 147 certification requires extensive FAA approval processes, specialized maintenance training facilities meeting strict safety standards, aircraft, engines, and specialized equipment acquisitions, FAA-certified instructional staff with current industry experience, and ongoing compliance monitoring and recertification.

Market Analysis and Regional Capacity

While industry demand for aviation maintenance professionals exists nationally, careful analysis reveals that existing regional capacity adequately serves projected demand. According to the U.S. Bureau of Labor Statistics, overall employment of aircraft and avionics equipment mechanics and technicians is projected to grow 5 percent from 2023 to 2033, with about 13,400 openings projected each year nationally.[1] However, this modest growth rate does not justify the proliferation of competing programs in a single state.

The Aviation Technician Education Council (ATEC) 2024 Pipeline Report provides critical context that Capitol Technology University has failed to consider. Despite new mechanic certificates shooting up 32% in 2023 to a record 9,400, enrollment at aviation maintenance technician schools was up only 6 percent in 2023, suggesting that the bottleneck is student interest and retention rather than program capacity.[2]

The Mid-Atlantic region currently serves multiple aviation maintenance programs that adequately address the projected demand:

- UMES
- Pittsburgh Institute of Aeronautics - Hagerstown Campus
- University of the District of Columbia Community College
- Delaware Technical Community College - Georgetown Campus
- Aviation Institute of Maintenance - Norfolk Campus
- Aviation Institute of Maintenance - Philadelphia Campus

Program Sustainability Concerns

Similar to concerning trends in other professional fields, the aviation maintenance education sector faces oversaturation risks. The parallel to pharmacy education serves as a cautionary example: despite rapid growth from 91 pharmacy programs in 2008 to 136 programs in 2018, applications to U.S. pharmacy schools have declined by more than 60% since 2013, leading to a national enrollment crisis.[3,4]

The specialized nature of aviation maintenance education means the applicant pool is inherently limited to students with specific technical interests and aptitudes. UMES has invested significantly in recruitment efforts and partnerships with community colleges and high schools throughout Maryland, the same region Capitol would target. Dividing this constrained pool between competing programs serves neither institutional sustainability nor student success.

Demonstrable Harm to UMES

The establishment of Capitol Technology University's duplicative program would cause direct and measurable harm:

Financial Harm: Competition for a limited applicant pool threatens UMES's ability to achieve sustainable enrollment levels necessary to justify the $2.5+ million state investment. With only 130 annual job openings statewide and our planned initial cohort of 25 students, even modest enrollment diversion could render our program unsustainable.

Academic Harm: Reduced enrollment may force UMES to eliminate specialized courses, reduce hands-on training opportunities, or delay program expansion plans, directly impacting educational quality.

Industry Partnership Conflicts: Aviation maintenance training requires partnerships with airlines, maintenance facilities, and airports for job placements. Competition between programs threatens these essential relationships and may saturate available training and placement sites.

Mission Harm: UMES's commitment to serving diverse and underrepresented communities may be undermined if program competition forces tuition increases or reduction in support services.

Impact on Educational Access and Diversity

UMES has historically served students from diverse backgrounds and underrepresented communities, consistently exceeding national averages for minority enrollment in STEM fields. Our aviation maintenance management program continues this mission in a field where minority representation remains critically low.

Both programs target similar student demographics but differ significantly in accessibility:

- UMES: In-state tuition of $9,365.50 annually, extensive financial aid, HBCU mission of accessibility
- Capitol: Private institution tuition of $26,003 annually (177% higher than UMES), potentially limiting access for underrepresented students

The $16,637.50 annual tuition difference represents a substantial barrier to access for students from economically disadvantaged backgrounds. Program competition could force both institutions to increase costs or reduce support services, disproportionately impacting students from underrepresented communities and undermining state workforce development goals to increase diversity in aviation fields.

Capitol's failure to accurately research existing programs, combined with their omission of critical industry data regarding enrollment trends and program sustainability, demonstrates inadequate due diligence. We respectfully encourage MHEC to take into account that some of the assumptions underlying this proposal are factually incorrect. A careful review of the existing educational infrastructure and industry analysis suggests that strengthening student retention may be a more effective priority than expanding programs.

In summary, the University of Maryland Eastern Shore respectfully objects to the establishment of a Bachelor of Science in Aviation Maintenance and Management program at Capitol Technology University. We ask MHEC to carefully consider the impact of program duplication on existing institutions and the students we serve, particularly given the significant resources already committed to aviation maintenance education in Maryland and the concerning national trends in program sustainability. We also recommend Capitol Technology University to partner with existing programs through articulation agreements or develop complementary specializations that do not compete directly with established programs.

Sincerely,

Rondall E. Allen, Pharm.D.
Provost and Vice President for Academic Affairs

References:

[1] U.S. Bureau of Labor Statistics. Aircraft and Avionics Equipment Mechanics and Technicians: Occupational Outlook Handbook. https://www.bls.gov/ooh/installation-maintenance-and-repair/aircraft-and-avionics-equipment-mechanics-and-technicians.htm.

[2] Aviation Technician Education Council (ATEC). 2024 Pipeline Report: Mechanic Workforce Pipeline Flow Increasing, But Demand Still Out-pacing Supply. https://www.atec-amt.org/workforce-data.

[3] Brown D. L. (2020). Years of Rampant Expansion Have Imposed Darwinian Survival-of-the-Fittest Conditions on US Pharmacy Schools. American journal of pharmaceutical education, 84(10), ajpe8136. https://doi.org/10.5688/ajpe8136.

[4] Antrim, A. (2023). Despite Rapid Growth of Institutions, Pharmacy School Applications Decline: Students still have a myriad of career options, including at retail pharmacies, hospitals, and outside traditional practice. Pharmacy Careers, 17(1), 3-4.