

September 21, 2018

The Honorable James D. Fielder, Jr., Ph.D.
Secretary of Higher Education
Maryland Higher Education Commission
6 North Liberty Street
Baltimore, Maryland 21201

Re: Response to University of Baltimore Objection to Goucher proposal for MS in Community-Based Health Services Management

Dear Secretary Fielder:

On August 15, 2018, Goucher College submitted to the Maryland Higher Education Commission a new program proposal to offer and deliver a fully online Master of Science in Community-Based Health Services Management (CBHSM) program framed within Goucher's mission of accessible and transformative education and the college's focus on community-based learning. On September 13, 2018, the University of Baltimore objected to this proposal based on the premise of program duplication. This letter outlines Goucher's response to specific assertions in the UB objection.

COMMUNITY-BASED FOCUS

UB OBJECTION: *Simply adding the phrase "community-based health services" to the names of courses does not fundamentally change the content of the course.*

GC RESPONSE: *Goucher College's mission-driven, long-term, and well-documented focus on community-based goals, learning, and engagement clearly differentiates this program and is consistent with both the title of the program and the content of its curriculum.*

UB's first objection to Goucher's Community-Based Health Services Management program centers on the concept of community-based learning. For the University of Baltimore to imply that the community-based focus of Goucher's CBHSM program is simply words added to the title (*University of Baltimore letter dated 9/13/18, p. 1*) to superficially differentiate the program from another institution's health services degree does not address Goucher's well-demonstrated and long-standing commitment to community-based learning, which is articulated in the mission, the vision, and the ideals of the college, embedded in the undergraduate and graduate curriculum, and evidenced by the community-based learning opportunities and partnerships that are part of Goucher's values.

Goucher's Mission and Vision statements provide that the college "prepares students within a broad, humane perspective" as it seeks to "become the model for accessible transformational education." (<https://www.goucher.edu/explore/who-we-are/mission>). These sentiments are expanded in the statement to specifically focus on the interaction among Goucher, its students, and its communities through clearly articulated Ideals that develop in our students "a sense of social responsibility and a system of personal and professional ethics" within "an environment that responds to students as individuals and as members of multiple groups." In fact, "education at Goucher is based on an

expanding sense of community” built on “a commitment to experiential learning on and off campus, as well as abroad” as students “apply and extend what has been learned in the classroom” to and within the community.

Further, at Goucher, Community-Based Learning (CBL) is a core competency that is:

“a way for students to actively connect their academic work with direct experience in the community. By combining hands-on work in the community with the academic framework provided by the curriculum, students gain a rich experience of social issues. Students learn about the workings of community; encounter differences related to race, class, and privilege; gain a deeper understanding about social justice; and are able to do work that is beneficial to others. They also gain a greater understanding of themselves. Community-based learning emphasizes academic rigor, reflection, and developing ongoing community partnerships” (<https://www.goucher.edu/learn/community-based-learning/>).

CBL adds to the value of a Goucher degree and students are encouraged to engage with CBL. Goucher focuses on ten distinct areas of CBL opportunities:

- Animal Welfare
- Criminal Justice & Prison Education
- Community Organizing
- Empowering Ability
- Environmental Justice
- Food & Housing Security
- K-12 Education & Youth Development
- Immigrant & Refugee Programs
- Neighborhood Development
- Health and Wellness/Mindfulness

Goucher’s proposed Community-Based Health Services Management program addresses and fulfills the CBL focus area of Health and Wellness/Mindfulness, and joins existing Goucher undergraduate and graduate programs in their demonstrated and long-standing commitment to teaching, learning, and working in our communities. In this context, the CBHSM program is a natural fit. Additionally, faculty who contributed to program development are long term full time faculty who will teach in the CBHSM program along with part time faculty distinguished by their ties to local community service initiatives and community-based health service organizations and agencies, and not simply “practicing experts in their fields” (*UB letter dated 9/13/18, p. 3*).

Three examples of Goucher’s existing commitment to CBL in the curriculum include:

- The Goucher Prison Education Program, which provides baccalaureate degree preparation in the community to inmates at the Jessup Correctional Facility to prepare these student to participate as active members of their home communities when they return.
- The graduate education programs, which emphasize teaching and learning in the community with professional development schools across the state, and that provide Master’s level training to support the challenges that teachers face in our community classrooms every day through concentrations in ESOL, At-Risk & Diverse Learners, Local School Improvement, and Managing Disruptive Behaviors in the Classroom.

- The SAGE Institute for Lifelong Learning, which addresses the enrichment and engagement needs of local residents in the senior living communities that surround the Goucher campus by increasing their access to academic, social, and global experiential learning opportunities.

These three programs, which will be among the community-based internship and practicum sites through which students in the CBHSM program will complete their experiential learning requirements, are only a few examples of the ways in which community-based learning extends from Goucher's mission to its curriculum to experiential and community-based practice.

FULLY ONLINE ACCELERATED DELIVERY

UB OBJECTION: *The University of Baltimore program runs on Saturdays in ten-week sessions to attract working adults and is offered in both Baltimore and at the Universities at Shady Grove. The University does have a number of online programs and courses within programs, and if there is truly a need for an online program, the University could develop one.*

GC RESPONSE: *Goucher has identified through environmental scanning a gap in provision of health services management education in the Baltimore region and proposes to address this existing need through its online accelerated CBHSM program.*

Online delivery is a second part of the UB objection. Online delivery provides a distinct and inarguable difference that negates any curriculum duplication by filling a need that is well-documented among adult learners, fulfills a desire for accelerated programs frequently heard from students (<https://www.chronicle.com/article/Students-Want-Faster-Degrees/243008>), and is a response to both a Maryland workforce shortage need and the Maryland state goals for higher education. Online education increases the ability of working adults with families and competing commitments to obtain advanced level education that will enhance both their career and financial mobility, while supporting health and wellness in the state and region.

Goucher asserts that the University of Baltimore's dismissal of Goucher's fully online delivery of its proposed CBHSM program, and UB's passing offer to develop such a program if needed, ignore the access and flexibility preferences of Baltimore region adults who seek increased opportunities and choices for learning in the online environment. UB's response also suggests a lack of awareness about the current higher education landscape. UB's offer to develop an online program is unnecessary based on Goucher's current proposal, and, moreover, would set a precedent for the evaluation of future cases of alleged duplication between existing face-to-face programs and newly proposed online programs.

The appeal of a Masters level credential delivered in a fully online format is well-documented nationally, as is the population of students available in the market to complete this degree. A recent survey conducted by The Learning House (<http://www.learninghouse.com/wp-content/uploads/2017/10/OCS-2016-Report.pdf>) provides demographic information about students studying online, as well as their perceptions about their program. Results showed that online graduate students are an average of 33 years old, working full time, and raising families. Sixty-nine percent reported their investment of money in the program was "worth it" and 71% felt the program was a valuable use of their time and 20% (the highest percentage) enrolled in the program to advance their career. Medical and Health Services ranked fourth of ten in the top graduate programs delivered online, with 12% of all graduate student respondents enrolled in online health services programs.

According to a report delivered at the Higher Education Remastered summit in Boston in June, 2018 (https://www.insidehighered.com/sites/default/server_files/media/Eduventures%20Summit_Garrett_Online%20and%20Inequality_15%20June%202018.pdf), online education is growing at a rate that outpaces traditional programs, but access to fully online programs is unevenly distributed across the country, with many of the larger fully online institutions with national reach enrolling larger numbers of students across state lines. In fact, the report asserts that only 2.5% of schools offer fully online programs to 50% of the students who study online. The report, using IPEDS and NC-SARA data, asserts that Maryland is among 27 states that lose more than 25% of in-state students to out-of-state online institutions and programs than gained from other states--a number that totals about 50,000 students in Maryland. The report concludes that online programs increase access and reduce inequality.

Further, this program builds on Goucher's demonstrated competency in design and delivery of fully online programs using the Canvas Learning Management System and Quality Matters Standards for best practice online education, and is Goucher's tenth online accelerated program at the graduate level — part of a strategic and intentional build-out of fully online accelerated programs to meet the access and success needs of students from across the region and the country.

The program also supports Maryland's workforce shortage sector and Maryland's 2017-2021 higher education plan (<http://www.mhec.state.md.us>), which articulates the following goals:

- **Access:** Ensure equitable access to affordable and quality postsecondary education for all Maryland residents.
- **Success:** Promote and implement practices and policies that will ensure student success.
- **Innovation:** Foster innovation in all aspects of Maryland higher education to improve access and student success.

Goucher's fully online accelerated Community-Based Health Services Management programs supports each of these three goals.

It is well-documented that high quality online programs support student access to higher education and promote student success. A Boston Consulting Group study *Making Digital Learning Work* (April 2018), funded by the Bill and Melinda Gates Foundation (<https://edplus.asu.edu/sites/default/files/BCG-Making-Digital-Learning-Work-Apr-2018%20.pdf>) supports the promise of online programs for increasing access and success in adult students. Specifically, online education shows increases in total student enrollment; increases in the proportions of specific populations, including Pell Grant-eligible students, minority students, older students, and female students; and increases in an institution's capacity to reach a broader array of students than simply state or region.

Additionally, National Bureau of Economic Research study *Can Online Delivery Increase Access to Education?* (<http://www.nber.org/papers/w22754>, 2017) makes the same argument, stating that "demand for the online option is driven by mid-career Americans. By satisfying large, previously unmet demand for mid-career training...these results suggest that low-cost, high-quality online options may open opportunities for populations who would not otherwise pursue education."

The accelerated format of Goucher's program—meeting the Maryland State goal for Innovation in terms of course design and delivery-- will also improve student success through its "Speed to degree" factor, which is very important to online college students. Results from a 2018 survey of adult learners point to the various programmatic features that address fast completion as important factors for the adult

student when selecting a specific online program. Year-round courses (33%), faster completion compared to classroom (29%), accelerated courses (23%), and frequent start dates (20%) are all important factors to many online students, and all address degree completion time. Goucher's proposed program addresses each of these preferences (https://www.insidehighered.com/sites/default/server_files/media/Eduventures%20Summit_Garrett_Online%20and%20Inequality_15%20June%202018.pdf). While UB's 10-week format begins to address acceleration, its traditional Fall and Spring admissions points negate any gain in time to degree from shorter courses. Simply shortening the length of a course does not automatically ensure acceleration or success.

PROGRAM CHARACTERISTICS, COMMON CORE CURRICULUM AND MARKET NEED

UB OBJECTION: *Program/Curriculum Duplication*

GC RESPONSE: Discipline-based certification standards require core courses/content that make some curriculum duplication unavoidable, which is the case in the Goucher proposal. However, program characteristics then serve as a significant differentiating and mitigating factor in duplication; marketplace need and workforce demand require increased capacity in advanced level preparation; and the significant undergraduate pipeline from 22 discipline-related programs in Maryland alone ensure adequate recruitment and enrollment opportunities for those Master's level programs most fully meeting the graduate level demand from adult learners (https://higherlogicdownload.s3.amazonaws.com/AUPHA/5c0a0c07-a7f7-413e-ad73-9b7133ca4c38/UploadedImages/Certification/Guidelines_for_Undergraduate_Certification_rev_2017.pdf).

Mission and Purpose

Goucher's response to UB's program duplication objection is built on the strength of Goucher's distinctive competencies (community-focus, online delivery, accelerated format, and program characteristics), which sufficiently differentiate its program from UB's Master of Science in Health Systems Management. In fact, the two programs are different in fundamental ways, beginning with the mission/purpose of each program:

UB's mission/purpose).

"The University of Baltimore's M.S. in Health Systems Management program furthers the professional skills of current and future senior health system managers in the efficient and effective management of local, state and national health care organizations. Graduates of the M.S. in Health Systems Management program will be able to work both independently and in team settings to identify, analyze and formulate solutions to the critical problems that affect the provision of efficient, effective and equitable health care services by health care providers." (<http://www.ubalt.edu/cpa/graduate-programs-and-certificates/degree-programs/masters-health-systems-management/mission.cfm>)

Goucher's mission/purpose:

"Education at Goucher is based on an expanding sense of community--a community where discourse is valued and practiced. The online Master of Science degree in Community-Based Health Services Management will prepare leaders and practitioners

to move into management positions in the health services sector across the state, region, and nation. These leaders and practitioners will be informed by a base of knowledge built on best practices in Community-Based Health Services Management and framed within Goucher’s mission of accessible and transformative education. This will, in turn, prepare a new generation of Community-Based Health Services Managers with the understanding, knowledge, and skill base to support diversity, encourage transformation, and ensure access to health services for all who require those services”(Goucher’s CBHSM proposal to MHEC 8/15/2018).

Program Characteristics

Further, Goucher contends that program characteristics also differ significantly between the Goucher and UB programs, in fundamental and substantive ways:

Institution	Goucher College*	University of Baltimore**
Number of credits	36 credits	39-45 credits
Mode of delivery	Fully online	Classes held on Saturdays
Time to completion	Complete in 18 months	Complete in 5 semesters
Length of courses	8-week terms	10-week terms; varies
Length of year	6 terms per year	2 semesters per year
Start points per year	6 admission points per year	Fall and Spring admission
Capstone experience	Internship or thesis	Internship

*from Goucher program proposal

**from UBalt.edu

Certification Standards and Core Content

Additionally, and ironically, another mitigating factor in duplication stems from UB’s reference to its undergraduate certification by the Association of University Programs in Health Administration—standards that require common learning content among all best practice programs such that, essentially, any undergraduate or graduate program referencing these standards as curriculum guidelines for quality programs would overlap. The required curriculum includes:

- The US Healthcare System
- Population/Community Health
- Cultural Competence/Diversity
- Organizational Development/Organizational Behavior Theory
- Management of Health Care Organizations
- Operations Assessment and Improvement
- Management of human resources and health professionals
- Information systems management and assessment
- Healthcare Law
- Governance
- Health policy
- Leadership
- Statistical analysis and application to decision making
- Healthcare Economics

- Post-acute Care
- Healthcare Marketing
- Financial analysis and management
- Ethics in business and clinical decision-making

Essentially, then, there are--as with many programs--simply some courses and subject matter that any high quality and industry-specific health services program would include.

Projected Enrollment

Enrollment is a fourth area that differentiates the two programs in size and capacity, yet also suggests higher demand for programmatic options. According to the University of Baltimore's 2017 Fact Book (https://www.ubalt.edu/institutional_effectiveness/institutional_research/reports/UB_Factbook_2016.pdf), Health Systems Management student enrollment grew from 94 in 2011 to 146 in 2016, which is a 55.3% increase in enrollment that reflects the growth in demand for Master's-level managers. Goucher anticipates a lower start-up capacity for its CBHSM program, beginning with 10 students in 2019 and increasing to 36 by 2023, a number that in reality does not seem to threaten the UB program viability. UB also cites in its objection letter that it is in a position to meet rising demand for the program regionally but, given the projected market growth, workforce demand, and extensive in-state and out of state demand, could not be expected to meet all demand, particularly given its on-ground, on-site delivery.

Enrollment growth is projected locally, state-wide and regionally, and nationally due to marketplace supply and demand. Additionally, there are twenty-two bachelor's degree programs in Maryland in the health care field, providing a pipeline of undergraduate to graduate students well beyond the projected capacity of the existing Masters programs in the state. This will meet the needs of those students wishing to apply their undergraduate practitioner's degree to a Master's program and is designed to increase and improve their marketability in a field where the Master's degree is a preferred credential at the management level (bls.gov "Quick Facts," Occupational Handbook, 2018).

Workforce need and Marketplace demand

Finally, as noted in the previous paragraph, high marketplace demand and workforce need offer a fifth response to UB's program duplication claims, and support the growth of program options for adults. This growth is well-demonstrated in Maryland, where, according to state projections, graduates of this program will help fill position openings as medical and health care managers in a variety of health care settings. Data from the Maryland Department of Labor website for employment projections show about 5000 positions in the Baltimore area (www.dllr.state.md.us/lmi/iandoproj/) and another 4,800 in the Washington metro area, with a 4% growth rate expected moving forward. Data from the Bureau of Labor Statistics show that the market for professionals in this field will grow approximately 22% between now and 2026 – 13% faster than other Masters level occupations, and 12% faster than all occupations together. Both the DC Metro region and the Baltimore Metro region are in the top ten regions for employment of health services managers, and Maryland ranks third in an evaluation of highest mean wage for these positions, at \$114,730 (www.bls.gov). Additionally, the Masters in Community-Based Health Services Management program supports Maryland's Governor's Workforce Investment Board's "Health Care 2020" action plan to grow Maryland's health care workforce by up to 25 percent and creates an additional need/mandate for individuals trained to administer and manage this growth (<http://www.gwib.maryland.gov/pub/>).

Furthermore, nationally by 2024, according to a report by the Center for Workforce Studies at SUNY Albany (2016), jobs in the home health care sector are expected to increase by 60%, while jobs in the

offices of health care practitioners are anticipated to grow by 25%. In fact, by 2024, 20 of the 30 fastest-growing occupations nationally are projected to be in health services occupations (chwsny.org). Health services administrators to support this growing sector will be as important as the applied positions in patient direct care. Goucher's emphasis on community-based health services management will appeal to a subset of these students interested in working in and for the network of community health care agencies and practices in Maryland and across the nation, as its fully online, accelerated format increases access to a more diverse population of learners who demand increased options and increased opportunities.

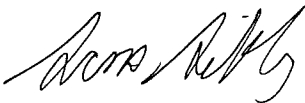
CONCLUSION

In closing, Goucher College believes that it has presented substantive evidence in this response to address the concerns raised by the UB objection to the MS in Community-Based Health Services Management proposal, and requests Commission approval for the program based on:

- Goucher's longstanding mission-driven community-based teaching, learning, and working focus;
- Goucher's fully online, accelerated format program delivery
- CBHSM distinctive characteristics and timeline
- Maryland State Goals for Higher Education 2017-2021
- Marketplace need and workforce shortage
- Certification recommendations for common curriculum in best practice programs

We are available to provide additional information on request, and thank you for your consideration of Goucher's response.

Sincerely,



Scott Sibley, Ph.D.
Interim Provost