



# Maryland Higher Education Commission

# Academic Program Review

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Information presented here is based on current regulatory processes (COMAR 13B.02.03)  
Last Revised: May 24, 2023

**Presentation to the Maryland Higher Education Commission**

# Academic Program Review: Steps in the Process

1. Completion Check
2. Circulation
3. Objections
4. Internal Analysis
5. Decision
6. Review Meeting

# Academic Program Review:

## 1. Completion Check

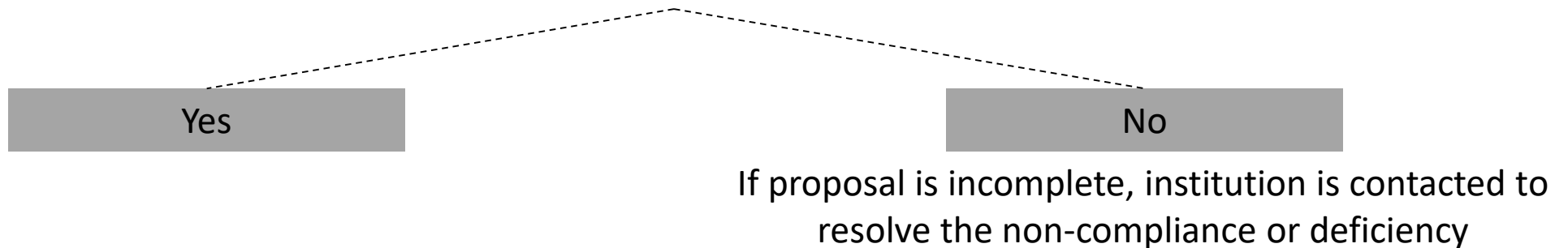
Institution submits a proposal and payment

- Depending on the type of proposal, board approval may be required
- President signature required on certain types of proposals

### **Is the proposal complete?**

This is not an analysis of the proposal.

This is simply to ensure all the required documentation and sections are completed.



# Academic Program Review:

## 2. Circulation

### Does the proposal need to be circulated for 30-day objection/comment period?

*Not all proposals require circulation.*

#### Proposals that require circulation:

New academic programs (degrees and stand-alone certificate programs)  
Substantial modification to an existing program

Yes

Proposal is emailed to distribution list and posted to MHEC website.

Internal analysis is conducted (compliance with COMAR 13B.02.03.06).

*See next slide for next step.*

#### Proposals that may not require circulation:

Certificates within existing programs  
Non substantial modifications  
Closed site approval  
Modality change  
Title change  
Notification of a program suspension/reactivation of suspended program/discontinuation of a suspended program

No

Internal analysis is conducted and recommended action is prepared for review.

Final decision is made and institution is notified.

# Academic Program Review:

## 3. Objections

### Has an objection been received?

The Secretary or an institution may file an objection to implement a proposed program based on at least one of four criteria:

1. Inconsistency of the proposed program with the institution's approved mission
2. Not meeting a regional or Statewide need consistent with the State Plan
3. Unreasonable program duplication which would cause demonstrable harm to another institution
4. Violation of the State's equal educational opportunity obligations under State and federal law

***Secretary determines if objection is justified.***

|                 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 |
|-----------------|------|------|------|------|------|------|------|
| # of objections | 3    | 9    | 9    | 11   | 5    | 8    | 2    |

*\*the objection process is established by Statute = Commission cannot change*

# Academic Program Review:

## 3. Objections

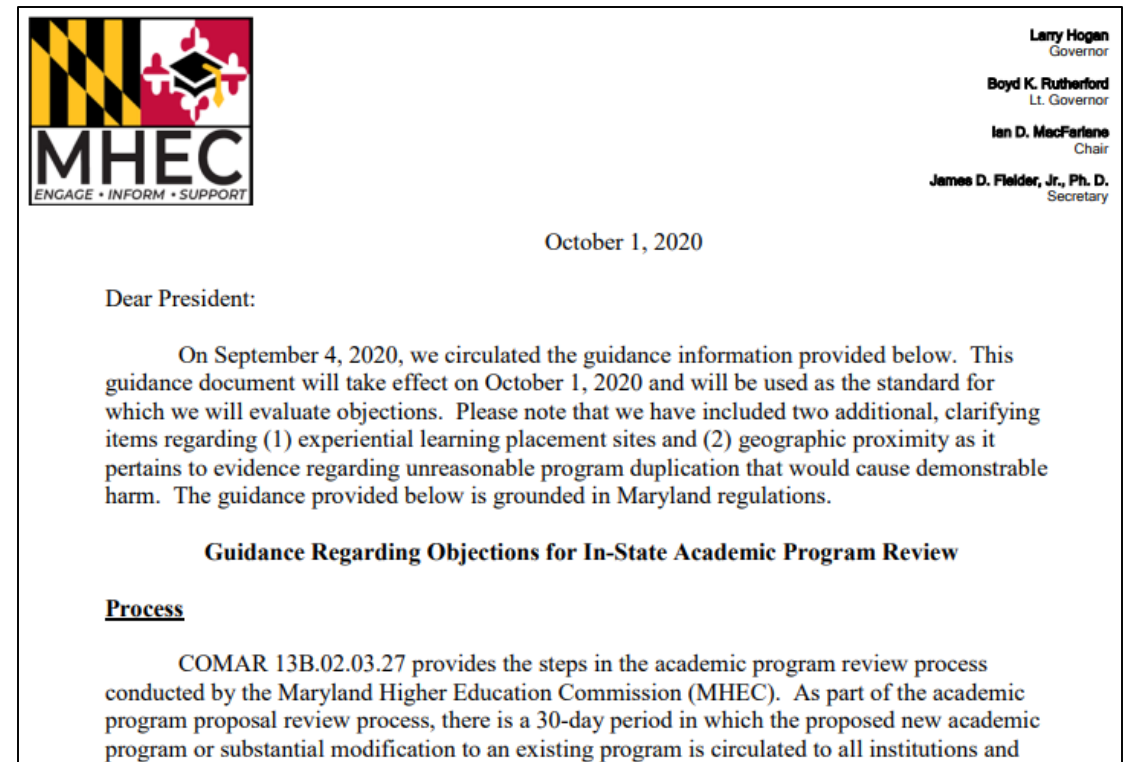
### What should be included in an objection? What makes an objection justified?

An objection is justified if:

(a) if it is based upon the one of the 4 criteria

-- and --

(b) is accompanied by detailed data and information supporting the reasons for the objection.



# Academic Program Review:

## 3. Objections

### Has an objection been received?

Yes

Proposing institution is notified of objection and provided an opportunity to respond.

Secretary determines if objection is justified.

If justified, Secretary negotiates with applicable institutions.

Additional information may be collected.

Potential collaborations between institutions is considered.

No

Internal analysis is completed and recommended action is prepared for review.

Final decision is made and institution is notified.

*\*the objection process is  
established by Statute =  
Commission cannot change*

# Academic Program Review:

## 4. Internal Analysis

### .06 Criteria for Program Review.

A program proposal shall address the following areas:

- A. Centrality to mission and planning priorities, relationship to the program emphasis as outlined in the mission statements, and an institutional priority for program development;
- B. Critical and compelling regional or Statewide need as identified in the State Plan;
- C. Quantifiable and reliable evidence and documentation of market supply and demand in the region and service area;
- D. Reasonableness of program duplication, if any;
- E. Relevance to the implementation or maintenance of high-demand programs at HBIs;
- F. Relevance to the support of the uniqueness and institutional identities and missions of HBIs;
- G. Adequacy of curriculum design, program modality, and delivery to related learning outcomes, consistent with Regulation .10 of this chapter;
- H. For public institutions, adequacy of articulation and transfer planning, consistent with Regulation .19 of this chapter;
- I. Adequacy of faculty resources, consistent with Regulation .11 of this chapter;
- J. Adequacy of library resources, consistent with Regulation .12 of this chapter;
- K. Adequacy of physical facilities, infrastructure, and instructional equipment, consistent with Regulation .13 of this chapter;
- L. Adequacy of financial resources with documentation, consistent with Regulation .14 of this chapter;
- M. Adequacy of provisions for evaluation of program, consistent with Regulation .15 of this chapter;
- N. Consistency with the Commission's minority student achievement goals;
- O. Relationship to low productivity programs identified by the Commission; and
- P. Adequacy of distance education programs under Regulation .22 of this chapter.



# Academic Program Review:

## 4. Internal Analysis

### **Duplication Analysis**

- ✓ *The elimination of unreasonable program duplication is a high priority.*
- ✓ *Ordinarily, proposed programs in undergraduate core programs consisting of basic liberal arts and sciences disciplines are not considered unnecessarily duplicative.*
  - ✓ *Unreasonable duplication is a more specific concern in vocational/technical, occupational, graduate, and professional programs which meet special manpower needs. The issue of how a proposed program meets an institution's local and State area needs shall be addressed.*

# Academic Program Review:

## 4. Internal Analysis

**In determining whether a program is unreasonably duplicative, the Secretary shall consider:**

- The degree to be awarded
- The area of specialization
- The purpose or objectives of the program to be offered
- The specific academic content of the program
- Evidence of equivalent competencies of the proposed program in comparison to existing programs
- An analysis of the market demand for the program

**The analysis shall include an examination of factors, including:**

- Role and mission
- Accessibility
- Alternative means of educational delivery including distance education
- Analysis of enrollment characteristics
- Residency requirements
- Admission requirements
- Educational justification for the dual operation of programs broadly similar to unique or high-demand programs at HBIs

# Academic Program Review:

## 4. Internal Analysis

### **Q1: Is there duplication?**

- Are the degrees the same?
- Are the areas of specializations the same?
- Is the purpose (or are the objectives) of the programs the same?

- Is the specific academic content of the program the same?
- Are the competencies the same?
- Are the admission requirements to the programs the same?

### **Q2a: Will the duplication cause demonstrable harm?**

- Would there be harmful changes in enrollment to existing programs?
- Would there be a saturation of clinical placement sites that would harm existing programs?
- Demonstrable v presumptive harm

### **Q2b: Is the duplication reasonable?**

- Is there market demand for student enrollment to the proposed program that is not currently met by existing programs in Maryland?
- Is there market demand in Maryland for graduates of the program?
- Are there differences in the role and mission of the institutions?
- Is the existing program a unique or high demand program at an HBCU?
- Is there an educational justification for the duplication with an HBCU/HBI?

# Academic Program Review:

## 4. Internal Analysis

### **What is evidence?**

*detailed data and information*

- ✓ Labor projections from the Maryland Department of Labor
- ✓ US Department of Labor Occupational Outlook Handbook
  - ✓ Market surveys
  
- ✓ Current enrollment and degree data for existing programs
  - ✓ Course descriptions
  - ✓ Accreditation materials
- ✓ Materials from national professional organizations
  - ✓ Clinical Placement Sites

# Academic Program Review: 5. Decision

## What is the decision?

Public Institutions

Approve

Deny

A public institution may not implement a program without the prior approval of the Commission.

Independent Institutions and  
Private For-profit Institutions

Recommend for  
Implementation

Do Not Recommend  
for Implementation

If an independent institution has implemented a non-recommended program that was based on a finding of unreasonable duplication, the Commission may recommend that the General Assembly reduce the institution's appropriation by the amount of aid associated with the full-time equivalent enrollment in that program.

*An institution may request a full review of the decision to be conducted by the 12-member Commission (see next slide).*

# Academic Program Review:

## 6. Review Meeting

### Is there a request for a full Commission review of the Secretary's decision?

*The Commission shall review a decision of the Secretary on a program proposal at the request of an institutional president.*

Yes

No

Written statements are prepared by the requesting institution and the Secretary.

The Secretary's decision stands.

Review meeting is scheduled and presentations are made by the applicable institutions and the Secretary.

The Commission makes a final decision which is not subject to appeal.

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|----------------------|------|------|------|------|------|------|------|
| # of objections      | 3    | 9    | 9    | 11   | 5    | 8    | 2    |
| # of review meetings | 0    | 3    | 3    | 2    | 1    | 4    |      |

# Current Challenges

- Definition of “undergraduate core liberal arts and sciences disciplines”
- First-come, first-served approach
- Definition of “substantial modification”
- Definition of “existing resources”
- Distinction of the independent and private institutions

# New Staff Structure

