



October 22, 2019

Emily A.A. Dow, PhD.
Assistant Secretary, Academic Affairs
Maryland Higher Education Commission
6 North Liberty Street
Baltimore, Maryland 21201

Dear Dr. Dow,

Thank you for the opportunity to respond to the Embry-Riddle (ERAU) application for Out-of-State renewal and relocation. Several of the newly proposed programs represent an unreasonable program duplication and would cause harm to the College of Southern Maryland's (CSM) existing MHEC approved Business Administration Transfer programs.

The College of Southern Maryland (CSM) has an existing articulation agreement with Embry-Riddle whereby a student who completes the Business Administration: Technical Management degree with a 2.0 GPA will have all credits granted in the articulated program applied to the Bachelor of Science degree in Technical Management. This agreement has not been terminated by either institution and has been active since 2006. In 2018, ERAU engaged CSM in conversations of updating the agreement and expanding articulations to include all CSM programs. We received communication from Michael Van Dusen on Dec. 18, 2018 indicating that the agreement was going to be signed. As this process took place, the previous agreement was never canceled. They have since been on-campus recruiting CSM students into these articulated programs as recently as September 2019.

The proposed curriculum presented by ERAU for A.S. Technical Management and A.S. Aviation Business Administration represents a significant duplication of course-work in close proximity. The Business Administration Transfer programs represent 25% of CSM's total transfer program enrollment. The proposal of ERAU to offer similar programs less than 12 miles from the Leonardtown Campus, 28 miles from the Prince Frederick Campus, and 43 miles from the La Plata campus, will negatively impact CSM's effort to attract student from the same area. As well, CSM's Business Administration program can be completed online creating another duplication.

The goal of our Business Administration program is to increase enrollment by reaching a larger pool of potential students within the Southern Maryland area, and in particular St. Mary's County, where the Pax River Naval Station also resides.

We appreciate your view of our claim that ERAU's proposal would cause an *unreasonable duplication* in close proximity of already approved MHEC programs. In addition, an articulation agreement already exists between CSM and ERAU to facilitate transfer for these A.S. degrees.

Sincerely,

Eileen Abel, PhD.
Vice-President of Academic Affairs

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