



August 12, 2019

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

(Sent via certified mail/email on 8/12/19)

Dear Secretary Fielder:

Thank you for the opportunity to review University of Maryland Baltimore County's proposed Lower Division Certificate in Allied Health Preparatory Studies. The undersigned presidents of Maryland's community colleges object to this proposal for two reasons. The first is that the program replicates Anne Arundel Community College's Intra-Professional Health Lower Division Certificate approved in fall 2019. Not only is AACC's program more rigorous in requirements than UMBC's as evidenced in the credits required and outcomes associated with our program, but it also was predicated on AACC's being the only such certificate in the region. Moreover, AACC's certificate was submitted with a pathway for students who completed this certificate to complete their studies. While it is possible for students to complete their work in Allied Health programs at UMBC, those pathways are not delineated. Moreover, UMBC has used 'Allied Health' as a catch-all for programming when fields within Allied Health are diverse and specific in nature. Further clarification of the pathways should be required. As such, this is a stand-alone Lower Division Certificate proposed by a four-year institution.

The Lower Division Certificate proposed by UMBC represents the inverse of the proposal AACC and Community College of Baltimore County proposed with the Bachelor of Applied Studies, and then also with AACC's and UMB's joint proposal to allow AACC to offer 300-level courses in our IPH Certificate. In both cases, both UMB and AACC believed that this pathway would be in concert with the Intersegmental Work Group on Applied Bachelor's resolution to focus on innovative programming and work on 3 + 1 agreements. The state plan articulates that "innovation in this context is not simply about innovative products – e.g., academic programs that match new or evolving industries – but also about innovative processes. Similarly, innovation can be used to solve new problems, or it can be used to provide new ways of solving ongoing or recurring problems. Either way, innovation and innovative ideas for postsecondary education should be implemented in both of the previous goals: access and student success." Both institutions were thereby surprised and dismayed when the regulation (§§10–210, 16-108, Education Article, Annotated Code of Maryland) was cited to claim that community colleges may not teach 300-level courses. In this particular case, two institutions came together to consider the competencies necessary and believed they were doing what was directed from the Intersegmental group. In this particular case, government did not support the innovation.

Not only did this signify a change in direction, but it was an interpretation of regulation, where the regulation did not define what qualified as upper or lower division certificates. If MHEC is going to claim that lower division equates to 200-level courses and below, it seems counter-intuitive to allow four-year intuitions to be allowed to award credentials (which is much more serious than the teaching of courses) at what it has defined as the domain of community colleges.

To be clear, what is at issue is interpretation of the Annotated Code of Maryland that has been used to provide rationale for decisions that seem contradictory to the Maryland State Plan that advocates for competencies and innovation—not COMAR 13B.

Finally, the rationale cited in the proposal for UMBC to offer an LDC is that “all of these programs are offered at two years colleges and with the demonstrated significant need for allied health professionals in the next five to ten years, a multitude of programs will be needed to successfully meet the workforce demand.” This was the very case that AACC and CCBC made to offer BAS degrees in limited areas that MHEC ultimately denied. If indeed that rationale is permitted, we believe that community colleges should also be allowed to grant credentials in areas of workforce where demand is not being met such as Computer Science, Cyber, Nursing, Teaching, and more.

Therefore, the undersigned presidents object to this proposal because of its duplication, and also because we believe it is contradictory to the interpretations of regulations used to prohibit community colleges from 1) granting BAS degrees, and 2) teach 300-level courses, which, University System of Maryland itself supported in fall 2019. Consistency of regulations’ interpretation being aligned with a general philosophy of how higher education institutions can support Maryland residents in achieving their workforce goals is paramount in the context in which we work.

Sincerely,

ALLEGANY COLLEGE OF MARYLAND
President

Cynthia Bambara 8/9/19
President Signature Date

Dr. Cynthia Bambara
Printed Name

ANNE ARUNDEL COMMUNITY COLLEGE
President

D Lindsay 8/8/19
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Dr. Dawn Lindsay
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Dr. James Ball

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CHESAPEAKE COLLEGE

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Dr. Clifford Coppersmith

Printed Name

COLLEGE OF SOUTHERN MD

President



8/9/19

President Signature

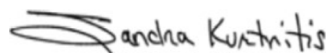
Date

Dr. Maureen Murphy

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**COMMUNITY COLLEGE OF
BALTIMORE COUNTY**

President



8/9/19

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Date

Dr. Sandra Kurtinitis

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HARFORD COMMUNITY COLLEGE

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**PRINCE GEORGE'S COMMUNITY
COLLEGE**

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President Signature

Date

Dr. Charlene Dukes

Printed Name

cc: Emily Dow, Ph.D.