



May 10, 2017

Dr. James D. Fielder, Jr.
Secretary of Higher Education
Maryland Higher Education Commission
6 North Liberty Street, 10th Floor
Baltimore, Maryland 21201

Dear Dr. Fielder:

Thank you for the opportunity to respond to the objection letter submitted by the University of Baltimore (UB) regarding the Maryland Institute College of Art's (MICA's) proposal for a Bachelor of Fine Arts degree program in Game Design. MICA received UB's objection from the Maryland Higher Education Commission (MHEC) on May 1, 2017.

In their letter, UB characterizes MICA's proposed Bachelor of Fine Arts (BFA) in Game Design as being unreasonably duplicative and potentially harming to UB's existing Bachelor of Science (BS) in Simulation and Digital Entertainment (SDE) because "(t)he programs have overlapping student learning outcomes, duplicative courses, and serve the very same market from adjacent campuses."

MICA's response addresses these concerns as well as other key elements of MHEC's duplication review criteria in COMAR 13B.02.03.09. Specifically, we will show that these programs are non-duplicative and highly differentiated by:

- Degree type
- Program philosophy and structure
- Structure of courses, curriculum, and pedagogy
- Foundation Studies as a core requirement of the BFA
- Accreditation standards for the programs
- Alignment with institutional mission and purposes
- Student recruiting and demographics
- Market demand for game design graduates

Further, we will show that the BFA in Game Design has a long history at MICA, that it is organic to the range of programs offered at contemporary art and design institutions, and that its continuing development is essential to maintaining MICA's position as a nationally and internationally competitive institution of art and design.

Finally, we will argue that—far from competing with or harming UB's program in Simulation and Digital Entertainment—the MICA program addresses a very different student market demand and labor need,

and that our success in developing this program will ultimately attract new talent and capital to the gaming and related industries in the State to the benefit of both programs, as well as other programs and employment sectors in Maryland's creative economy.

Our response is organized in line with the areas of differentiation and the other considerations outlined above.

1) Differences in Degree Type

The University of Baltimore objects to MICA's proposed BFA in Game Design claiming that "(t)he proposed MICA BFA has many courses similar to UB's BS courses, and overall the proposed BFA extends into the goals and reach of the UB Program, both in its current form and in UB's continuing expansion of game design offerings." Given that UB seems concerned to protect both its present and its future offerings in this area, it is important to fully register that these two programs have entirely different degree structures, and in this sense, are formally non-overlapping and non-competitive.

The differences between the BFA and the BS are elaborated below, and concern everything from program philosophy and structure, to learning outcomes, accreditation standards, institutional context, institutional mission, and what our students seek to do after graduation. It is important to understand at the outset that virtually every undergraduate program that MICA teaches is replicated in one form or another within the State, but typically not as a BFA, and not with the requirements that are specific to MICA's institutional type. The BFA degree structure and its requirements make MICA's proposed program in Game Design both unique within the State of Maryland and competitive on a national and international stage.

2) Differences in Program Philosophy and Structure

The proposed BFA in Game Design at MICA will provide students with an understanding of the influence and potential of games within society, with a focus on the significant ability of games to educate, critique, and function as an art form. This program defines games and play broadly to include immersive theatre, real world games, playful artworks as well as video games. Working in a team-based, open lab model, students will learn to make games from prototype to finished form and will be able to focus on individual areas of interest including game design, narrative, art production, programming, animation, sound, and more, as they work on collaborative projects with a variety of external partners.

UB's BS in SDE, by contrast, appears to be more applied, technical, and computationally oriented, focusing on "applied game design theory, the fundamentals of computer programming, 3-D modeling and animation, usability design, the application of simulation to education and other non-entertainment fields, and the design of multiplayer games" (UB website). UB mentions in its letter of objection that MICA wrongly characterizes their program as located within a "computer science department." However, given the applied and computational focus of the program, the fact that most of their current core courses use a computer science (COSC) mnemonic, and the fact that the stated purpose of the program is to "help prepare you for graduate study or a career in information technology and computer science, as well as business and visual design" (UB website), it is perhaps a mistake that is easily made.

In sum, MICA's program is focused on artistic, conceptual, and experimental elements of games, the social and cultural context of play, the exploration of interactive arts, and gamification, and prepares students for careers as conceptual artists and designers who conceive and create new narratives, new types of interactivity, and new applications for learning, making, and exploring through games. UB's

program is focused on the applied, technical, and computational aspects of game development and prepares students for jobs as developers and technicians in video gaming, animation and affiliated industries. These philosophies and outcomes are appropriate to the distinct and highly differentiated degrees being offered by the two institutions and the two programs.

3) Differences in Structure of Courses and Curricula

As part of its objection, the University of Baltimore argues that MICA's BFA in Game Design "has many courses similar to UB's BS courses, and overall the proposed BFA extends into the goals and reach of the UB program." UB provides a list of MICA courses that they believe show duplication and overlap with UB offerings. While a few of these courses share some overlap of technical skill sets and learning outcomes that are part of any Game Design curriculum, UB's argument fails to acknowledge the relatively small amount of overlap in content and learning outcomes, as well as the significant differences in how the courses are taught and how they are situated in the distinct degree plans of the two programs.

MICA's Game Design courses all feature a strong art and design focus coupled with a studio-based approach to instruction that includes a well-defined art and design critique process as a core pedagogical practice. Creative studio practice provides an essential intellectual and artistic foundation for MICA's Game Design BFA. MICA's classes meet for 5 hours, once each week and include the active development of a studio practice and student project collaboration under faculty supervision, as well as extensive opportunities for class and individual critiques. UB classes meet once each week for 2.5 hours. This structure is aligned with a teaching modality typical of a comprehensive institution, and does not include the faculty contact hours or core pedagogy of studio-based critique that is part of the requirement for the MICA BFA.

The UB BS in Simulation and Digital Entertainment program contains a number of courses in computer technologies and programming as part of its core curriculum. Core requirements include "Internet Technologies: Mastering the Basics" (COSC 155) and "Programming for Interactive Design (COSC 315)." In the MICA Game Design program, computer coding and development is embedded in creative studio practice rather than being the subject matter of stand-alone courses.

UB's program has a clear focus on video game creation while MICA's multi-modal and multi-platform approach is much broader and includes possible applications of game design in education, government, military, social enterprise, social innovation, and most importantly, as a fine art practice, which is a core preparation for all students at MICA, and is reflected in our institutional learning outcomes for the BFA.

In order to buttress its claim of "extensive curriculum overlap" between the two programs, UB makes several specific comparisons between different UB and MICA courses, but the courses they select are only a small portion of the wide range of courses available to MICA students. MICA's program is interdisciplinary and allows students the flexibility to choose multiple pathways and tailor their study within the BFA. Moreover, many of UB's selective comparisons are misleading:

- Several of the "overlaps" compare UB requirements with MICA electives, including courses drawn from MICA's Graphic Design and Animation departments.
- In other instances, UB asserts that MICA is replicating UB courses which they acknowledge are still in development at UB, and are not yet posted publically in their course offerings, nor included as part of their BS SDE degree plan.
- UB's COSC440-"Frontiers of Game Design" is compared with MICA's IAGD321-"Virtual and Augmented Reality Games." UB concedes, however, that "Frontiers of Game Design" features

revolving topics with virtual and augmented reality studies occurring only occasionally.

4) Foundation Studies as a Core Requirement of the BFA

To further differentiate the MICA BFA in Game Design from the UB BS in SDE, all MICA undergraduates—including Game Design majors—have foundational training in their first year that is focused exclusively on their education as artists and designers. “Foundation Studies” focuses on the development of visual and spatial acuity, materials research and experimentation, historical and humanistic studies of art and design, and a range of other creative skills and epistemic orientations. This first-year experience serves as a core curriculum fundamental to the education at MICA, to the BFA degree structure, and to the accreditation guidelines that are common to the fields of art and design. All nine required courses in MICA’s Foundation Studies program seek to develop the particular knowledge, mind-sets and skills intrinsic to the study of art and design.

Foundation Studies also introduces the critique process, a pedagogy integral to the majority of MICA studio art and design courses; a process that explicitly develops students’ abilities to reason abstractly and to think critically. In the Game Design Program, abstract reasoning and critical thinking are central to degree and its introductory required courses, Game/Play, and 2D Game Design: Introduction to Game Programming.

Foundation Studies and First-Year Liberal Arts courses account for 25% of the undergraduate BFA degree requirements. In many ways, these first-year requirements define the unique preparation that students receive at an art and design institution. Only those students who are interested in this kind of broad, interdisciplinary arts curriculum choose to attend MICA. Students seeking a more strictly technical or applied program, or one that is coupled with deeper scientific or computational learning associated with comprehensive institutions do not typically come to MICA. This is another way in which the two programs are differentiated and another reason why there is little or no overlap in our core disciplinary recruitment areas with UB.

5) Differences in Accreditation

As an independent school of art and design, MICA and its programs are periodically reviewed and accredited by the National Association of Schools of Art and Design (NASAD). NASAD is the primary accreditor for art and design programs and institutions in the United States and has been designated by the U.S. Department of Education as the agency responsible for accrediting, and establishing national standards for undergraduate and graduate degree programs with a visual- and fine-arts focus. MICA’s BFA in Game Design has been evaluated and approved by NASAD’s Commission on Accreditation (November 2016). To achieve this approval, this program has needed to demonstrate alignment with criteria for the BFA degree with a primary focus in art and design. These criteria include demonstrating program alignment with distinctive principles and practices of art and design education, including that “studies, practice, and experiences in studio subjects are of prime importance in the preparation of students for professional careers in art and design. The excellence of the creative work produced by students is the best determinant of the adequacy of the studio studies offered by an institution. Creative work includes, but is not limited to, conceptualization, process, product, and critique” (NASAD Handbook VIII.B.1, page 96).

As a NASAD approved program, the MICA BFA in Game Design has been judged to be fully compliant with these principles and practices. The UB program has not sought, nor (as a non-BFA, non-art and design program) could it seek, this accreditation. This specialized accreditation further demonstrates

that the overall program design and purposes of what we are doing at MICA are fundamentally different from the design and purposes of UB's BS in SDE.

6) Alignment with Institutional Mission and Purposes

UB is a public comprehensive university focused on “the needs of a diverse population in an urban setting” (UB website). MICA is a private College with a specialized mission focused on “the vital role of art in society” and “dedicated to the education of professional artists and designers, and to the development of a collegiate environment conducive to the evolution of art and design” (MICA website). In our view, the objections raised with our program by UB arise from a failure to fully comprehend our basic differences in mission, including both our purposes as institutions and the very different populations that we serve.

As we have shown, the BFA in Game Design is aligned with the structure and outcomes of our other BFA programs at MICA. Historically, these programs define and support our mission as a specialized College of art and design. The BFA in Game Design arises out of curricular developments that began in the early 2000s within MICA's Interactive Arts Department, which is the home for the existing Game Arts concentration as well as the new BFA in Game Design. The popularity and enrollment for the Game Arts concentration have grown steadily since it was first offered over six years ago, with more than 50% of Interactive Arts majors currently focusing their studies on game creation in one form or another. Indeed, the Game Arts concentration was developed for the purpose of expanding the offerings of the Interactive Arts Department, and the current launch of the Game Design BFA degree continues this trajectory of development by providing a major field of study that addresses an emergent field within Interactive Arts and an emergent area of demand within our undergraduate student population.

In sum, the evolution of the concentration into the Game Design degree is internal and organic to MICA and is part of developments in art and design education that have been taking place over the past two decades with the emergence of digital media and design practice as increasingly powerful forces within our fields.

7) Differences in Student Recruiting and Demographics

In their letter of objection, UB makes the claim that both programs “serve the very same market from adjacent campuses.” The idea that these two programs are in competition because MICA and UB are physically proximate shows a misunderstanding of the programs, the different way they work at the two institutions, and the different demographics they are meant to attract.

First, as we have shown above, MICA does not recruit students for specific programs so much as it recruits students who want to attend a specialized art and design institution. Students do not formally choose a major until the spring of their first year, and they are encouraged throughout their time at MICA to constantly push on disciplinary boundaries and to move between programs. The existing Game Arts concentration is very popular, with 30 students selecting the concentration this year. Although many of these are from Interactive Arts, they also come from a wide range of majors at MICA including painting, printmaking, illustration, fiber, sculpture and architecture. We are seeking to establish the Game Design BFA in response to changes in our fields and to the demands of an existing student population that has demonstrated an increasing interest in this area of art and design education.

Second, having adjacent campuses has no relationship with sharing an applicant pool or competing for the same students. Over the past decade, MICA has increasingly focused on recruiting students from

across the country and around the world. This past year we recruited from 48 states and over 55 different countries. Next year's entering class will be more than 35% international. In contrast, UB draws from a highly local market with only 4.5% of students coming from outside of Maryland and 3.3% from outside the country (<http://www.ubalt.edu/about-ub/>). According to our admissions department, of all the deposits we have received in the past two years that indicate an interest in Game Design, only 3 are from Maryland. Our competition is not with UB and is not in Baltimore. Our competition is with specialized art and design schools in Rhode Island, Chicago, California, Canada, and increasingly in Europe and China.

Third, there is a huge cost difference between these two programs. UB charges \$4,412 in tuition and fees per semester for in-state undergraduates and \$10,352 in tuition and fees per semester for out-of-state undergraduates. MICA charges \$23,495 for tuition and fees per semester. This difference in cost further differentiates the markets for the two programs.

Finally, the admissions standards between the two institutions, and thus, the two programs are very different. Admission to MICA is portfolio-based and selective. In addition to academic credentials and test scores that qualify the applicant as prepared for college-level work, a portfolio of artwork is required to gain admission to the college. The portfolio must demonstrate pre-college training in the visual arts by professional artists or art educators. This ensures an advanced level of experience in the arts prior to entrance to the College. Again, because we are a specialized art and design institution, MICA's successful student applicants are typically very different from those who apply to UB.

Because MICA's mission and purposes have a specialized focus on art and design education, because our reach is national and international, and because we are a private institution with a significantly higher cost of educational delivery and a differently selective admissions procedure, there is almost no overlap in the student populations that might attend these two programs.

8) Market Demand for Game Design Graduates

In their letter of objection, UB writes that, with respect to the demand for graduates in game design, "jobs remain unfilled because higher education seats remain open, not because there are not enough of them." It is unclear from this statement, or any of the evidence that is presented, what the specific jobs are that are being discussed and where the open seats are, but the video game industry is growing at an annual pace of 4-6% nationally (and even faster globally), and the demand for skilled and creative talent in game design, animation, illustration, film and user-experience design, is outpacing most other occupations in the art and design fields.

MICA is committed to working with educational, industry, and government partners to develop the State of Maryland and Baltimore as a leading destination for the creation and retention of design-led entrepreneurs and businesses. In our view, this ecosystem benefits from a diverse and multi-dimensional talent pool that will attract new entrants and build on the existing industry and not from a narrow approach that focuses on protecting "seats" for a (wrongly perceived) limited quota of existing demand.

As we have shown, MICA's new BFA program in Game Design is not only very different from UB's BS in SDE, it is also a program geared specifically toward the education of a diverse pool of creatives that draws talent from around the world to the State of Maryland. Over 40% of MICA graduates remain in the State for at least four years. While some of our recent graduates have gone on to become

producers, game designers, user interface designers, and technical artists in the game industry, others have started their own studios and are finding success as entrepreneurs building both serious and entertainment games. Others are working as interactive designers, exhibition designers, teachers using games in the classroom and as artists using games and play in their artistic practice.

MICA already has a strong alumni network working in these disciplines, with many serving as leaders in the field. Baltimore provides MICA graduates with an ideal base to launch successful startups, and many have done so, including Brinkbit, an HTML5 game platform; Friends of the Web, a web and mobile app design firm; Studio 217, a VR and mobile studio; and SparkyPants, a game studio which alone has brought over 30 new jobs to the city.

What we are describing is an approach to the field and to the question of market demand that is oriented toward developing the diverse and differentiated elements of the ecosystem for game development and design in the City of Baltimore and the State of Maryland. It is in this sense that UB's objection to our BFA in Product Design is not only factually incorrect and without basis; it is also counterproductive with respect to the underlying goal of advancing this industry and the educational and professional opportunities associated with it in the State of Maryland.

Conclusion

MICA maintains that the proposed Bachelor of Fine Arts in Game Design substantially differs from UB's existing Bachelor of Science in Simulation and Digital Entertainment. While these programs are geographically proximate, we respectfully assert that they are complementary and not unreasonably duplicative. There is no evidence that MICA's new BFA would cause any demonstrable harm to UB's program in terms of reputation, student and faculty recruitment, financial resources, or job opportunities for graduates. On the contrary, the state-level and national market demand data suggest the need for additional, more diverse, and more specialized degrees in this field, and not fewer.

Thank you for the opportunity to address the points raised in UB's objection letter. Please do not hesitate to contact me if I can provide additional information to MHEC in support of MICA's proposal. We understand that MHEC's statutory 60-day decision deadline for this program proposal, as posted on its website, was April 28, 2017. We urge MHEC to recommend the implementation of MICA's BFA in Game Design so that we are positioned to move forward with a fall 2017 semester implementation, as originally planned.

Sincerely,



David Bogen
Vice President for Academic Affairs and Provost

cc: Ms. Tina Bjarekull, President, MICUA
Dr. Michael Kiphart, Director of Academic Affairs