




Office of the Provost and Senior Vice President for Academic Affairs

MEMORANDUM

Date: November 20, 2019

To: The Honorable Dr. James D. Fielder, Jr., Secretary
Maryland Higher Education Commission

From: Dr. Lesia Crumpton-Young 
Provost and Senior Vice President for Academic Affairs

Subject: Objection to the New Academic Program Proposal:
University of Maryland College Park Doctor of Public Health (DrPH)

Attached please find Morgan State University's objection letter to the proposal from University of Maryland College Park to offer Doctor of Public Health (DrPH) degree program.

Morgan State University strongly objects to the proposed program on the basis of unreasonable program duplication which would cause demonstrable harm to MSU's DrPH program.

Should you have any questions, please do not hesitate to contact me via lesia.young@morgan.edu or farzad.moazzami@morgan.edu.

c: Dr. David Wilson, President
Dr. Emily Dow, Assistant Secretary for Academic Affairs, Maryland Higher Education Commission
Dr. Farzad Moazzami, Interim Assistant Vice President for Academic Affairs
Dr. Kim Sydnor, Dean, School of Community Health and Policy

Morgan State University's objection letter to the proposal from University of Maryland College Park to offer Doctor of Public Health (DrPH) degree program

Morgan State University has reviewed the proposal submitted by the University of Maryland College Park to institute an Online DrPH degree program with area of concentration in Executive Public Health Leadership. Morgan State is raising an objection to the program on the basis of COMAR 13b.02.03.09 and assert that the proposal program would be an unreasonable program duplication that would be harmful to another institution.

UMD throughout its proposal made several statements against duplication specifically related to characterizations of Morgan State University's Doctor of Public Health Program. We counter that proposition with the following:

1. **Differences in Admissions Requirements:** The University of Maryland College Park proposal identifies their entry requirements and student prior experience as being distinguishing features. In fact, the proposal incorrectly characterizes both. We do expect that our students have some experience and expect that they will be full-time working professionals; this is the reason why the program is an evening-based program. Our entry requirements include having a Master's degree in Public Health or some related field. The proposal may be referring to the developmental period of the program before the initial accreditation when entry into the DrPH program was allowed with an undergraduate degree mirroring many PhD programs. However, from initial accreditation until the present, a master's degree or other advanced professional degree (e.g. MD, JD, etc.) has been a requirement for admission into our DrPH program. Thus, the proposed UMD program is not distinguishable based on subsection section 2f of COMAR 13b.02.03.09.
2. **Distinction of Being an Online Degree Offering:** A second distinction UMD attempts to make is the fact that their program is online/primarily online. However, the fact is that Morgan State has implemented an Online Master of Public Health with an area of concentration in Executive Health Management. Several of the courses provided in this online format are currently available to our doctoral students who wish to pursue interests in this area. The majority of the competencies that UMD indicates it wishes to offer its DrPH as distinguishing, are available and offered to our DrPH students either as electives or augmented courses. We view this availability as mitigating the argument that the online delivery makes the UMD proposal unique. We assert that the proposed program does not offer an alternative delivery that is substantially different per subsection 2c for COMAR 13b.02.03.09.
3. **Generalist vs Specialization:** An additional distinguishing characteristic proposed by UMD seems to rest in the language of specialization versus generalist degree. For clarification, the accrediting agency (Council on Education for Public Health – CEPH) regards a generalist degree as an area of specialization as it specifies the focus of any generalist degree. What UMD has presented as a specialization in fact mirrors the core foundational knowledge and set of competencies that any DrPH degree, including our generalist degree, would have to cover. Several of the new courses proposed by UMD appear to respond to the new required core DrPH competencies required for accreditation. The competency areas and expectations listed under educational learning outcomes for the UMD specialization beginning at the bottom of page 5 of the proposal are already resident in the DrPH program of Morgan State University. Of the five specialization specific learning outcome statements, only two are truly unique from our review and vantage point, and uniqueness is only reflected in one two-credit course (Leadership in Crisis). While the document depicts how the curriculum aligns with the foundational competencies for all DrPH programs (Appendix C), a

similar alignment of the curriculum to the specialization learning outcomes (i.e., competencies) was not provided. Our assertion of duplication responds to subsection 1b (specialization) and 1d (academic content) of COMAR 13b.02.03.09.

4. Impact on the HBI: All of the above notwithstanding it is an established fact that the University of Maryland College Park, as a public state institution, is a well-resourced institution while Morgan State University, as a public state institution, has historically been denied adequate resources as evidenced by the pending coalition case. UMD already dominates the public doctoral marketplace with its eight (8) PhD programs in public health – each having very limited distinction among themselves. Because of its resource and historical advantage, the institution's entry into the DrPH public institution marketplace, in any form, would assuredly undermine the ability for Morgan to both sustain and grow its current program. The fact that College Park only wants to grow to a cohort of 12 per year, if this is the case, is further indication that this is more about being present in the DrPH market than about meeting workforce demand as denoted in the proposal. We assert that the proposed program is too similar to an existing program at an HBI per subsection 2g for COMAR 13b.02.03.09.
5. Program of Study Length of Time: The UMD proposal suggests that the time to completion for their proposed DrPH is substantially different from ours as the degree requirement is for completion of a capstone instead of a dissertation. The UMD proposed plan of study would have students complete the degree in three years with capstone completion occurring over three terms/semesters. While our degree program appears as if it is designed for a four-year completion rate (two years of courses and two years to complete the dissertation), the degree program could be completed in three years. Our students enroll in their first dissertation course the beginning of the third year, just as the proposed plan of study for UMD has its DrPH students begin the capstone process in the third year. In our accelerated plan DrPH students may enroll in their first dissertation level class during the second semester of year two depending on prior course completions.

Another similarity between our program and the proposed program that has implications for the length of study is how the field practicum is integrated into the curriculum. Our DrPH students are prepared to utilize the practicum experience as a catalyst for the dissertation. This linkage of the practicum courses with the development of the dissertation is similar to what is described in the UMD proposal to link the field experience with the capstone. In fact, the capstone projects described in the UMD proposal are not different from the types of dissertations our students are encouraged to complete.

6. Uniqueness. There is nothing noteworthy in the degree that would prevent the same areas of interest to be addressed under the UM's current PhD in Public Health. As noted, University of Maryland offers eight PhD concentration areas, including a PhD in Behavioral and Community Health. The online description of this degree is highly consistent with the proposed DrPH area of concentration. It would be in many ways a replication of their own degree. Supporting this idea, the DrPH proposed by UM would be offered under the Behavioral and Community Health Department, signaling even further that the proposed degree is in alignment with an existing PhD it offers.

Additionally, even the distinction made between the University of Maryland College Park relative to the Bloomberg degree i.e. qualifying exam and dissertation, are not necessarily discriminating features; it has been established that both DrPH and PhD programs can share these characteristics and therefore undermines the necessity for College Park to initiate a DrPH degree program of its own.

Addressing the workforce issues, we assert that Morgan has the capacity to absorb an additional 12 students per cohort, has the faculty and expertise to address the interdisciplinary leadership training, and is uniquely positioned to fill this niche in the state higher public education space. It should not be overlooked that Morgan State was the first HBCU to have a doctoral degree in Public Health in the nation. It is further noted that Morgan was constrained in offering a DrPH versus a PhD at the time the program was initiated, considering the practice space reflected by the DrPH to be more in alignment with an HBCU in general and the Morgan mission specifically. This historical decision implemented a constraint that should also have the benefit of protection from encroachment by other public institutions. In closing, from our perspective, the assertions of the University of Maryland College Park in presenting its proposal obscures the commonality between the DrPH offered by Morgan and the proposed UMCP DrPH degree. It is hoped that we have clearly made the case that duplication is indeed present.