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Sanjay Rai, Ph.D.
Acting Secretary

December 20, 2023

Senator Nancy J. King
Program Approval Process Workgroup Co-chair
120 James Senate Office Building
11 Bladen Street
Annapolis, MD 21401

Delegate Stephanie Smith
Program Approval Process Workgroup Co-chair
314 Lowe House Office Building
6 Bladen Street
Annapolis, MD 21401

Dear Senator King and Delegate Smith:

Thank you for the opportunity to provide written comment on the December 10th draft recommendations of the Program Approval Process Workgroup. We firmly support the recommendations and offer the following technical changes. In addition to the recommendations, I commit to a continued review of the academic program review process employed by MHEC, in collaboration with all institutions and stakeholders, and will make additional improvements that bring further transparency and collaboration.

Suggested Revision to Recommendation 2: The Workgroup recommends that MHEC utilize their current authority to develop detailed criteria for mission statement review of public institutions of higher education to ensure that mission statements are clearly defined and distinct between each institution. The criteria should evaluate the role each public institution of higher education in the State's system of higher education.

Suggested Revision to Recommendation 3: The Workgroup recommends that after the Commission conducts a mission statement review and approves all mission statements, MHEC submit a report to the House Appropriations Committee, the Senate Budget and Taxation Committee, and the Senate Education, Energy, and the Environment Committee on each approved mission statement and the analysis used to approve the mission statements. The committees should use this report to ensure that the State is supporting each institution in meeting the needs of their approved mission statement.

Suggestion Revision to Recommendation 5: The Workgroup recommends that MHEC should update the State Plan for Higher Education with information identified in Recommendation 4. The Commission should review a draft by October 2024 and a final version adopted no later than January 2025. The Workgroup recommends that MHEC utilize representatives from all segments of higher education, students, and members of the public in developing the revised

State Plan for Higher Education.

Suggested Revision to Recommendation 7: The Workgroup recommends that MHEC, MDL, and Commerce should each have a specific PIN dedicated to defining and identifying State and regional workforce needs. MHEC, MDL, and Commerce should work with MLDS, licensing boards, and national organizations to define and identify State and regional workforce needs.

Suggested Revision to Recommendation 8: The Workgroup recommends that MHEC, MDL, and Commerce have common agreement on data sources and measurements regarding State and regional workforce needs. These data sources should include information on current and emerging workforce needs. All institutions of higher education should have access to these data sources. MHEC, MDL, and the Commission should use these data sources during the program approval process.

Suggested Revision to Recommendation 9: After the adoption of the revised State Plan for Higher Education, the Workgroup recommends that MHEC require all senior higher education institutions to submit a “Programmatic Plan” which would require senior higher education institutions to outline each graduate academic programs that the institution plans to submit by the end of the 2 year time period. Programmatic Plans should align with current and emerging workforce needs as identify by the State Plan for Higher Education (and the collaborative state agencies), particularly graduate programs that create new knowledge and intellectual property to be competitive in emerging areas of the global economy. MHEC should adopt a specific format, due date, and review criteria of the Programmatic Plans. MHEC should use the Programmatic Plans to provide early warning signals of potential duplication with existing program.

Suggested Revision to Recommendation 11: The Workgroup recommends that the General Assembly create a Collaborative Grant Fund that would be accessible for public institutions of higher education to fund efforts to collaborate with each other for the establishment of new graduate degree programs.

Suggested Revision to Recommendation 14: The Workgroup recommends that a vote of the majority of the Commissioners appointed to the Commission be required during a review meeting.

Suggested Revision to Recommendation 15: The Workgroup recommends that MHEC develop and adopt an administrative procedures guide for the department’s program approval process by June 2024 and prominently post the administrative procedures guide on the department’s website.

Suggested Revision to Recommendation 17: The Workgroup recommends that MHEC, in collaboration with all institutions, find a consensus as to whether 33% is the appropriate standard to trigger a full program review of a substantial modification to an existing program. If MHEC finds that a new standard is more appropriate, MHEC should update their regulations by January 2025 with a detailed explanation of the new standard.

Again, thank you for the opportunity to provide written comment. Please let me know if you have any questions. I look forward to our next Workgroup meeting.

Thank you,

Handwritten signature of Sanjay Rai in black ink, consisting of the letters 'S', 'K', and 'R' in a stylized, cursive font.

Sanjay Rai, Ph.D.
Acting Secretary