



June 24, 2015

Jennifer Vest Frank, PhD
Assistant Secretary
Maryland Higher Education Commission
6 N. Liberty Street
Baltimore, MD 21201

RE: Stratford University Response to Morgan State University's Objections

Delivery to: acaprop.mhec@maryland.gov

Dear Dr. Frank:

Stratford University appreciates the opportunity to respond to the letters of objection expressed by Morgan State University (MSU). Reviewing the MSU objections they appear to fall into three broad categories. The first being Stratford's lack of experience in liberal arts general education and competition with existing Maryland institutions, the second being a question of Stratford's accreditation, and third being Stratford's vision and mission. This response will address each of these concerns expressed by MSU including reinforcement of need.

Experience and Competition:

Stratford University is a comprehensive university founded in 1976. It is approved to operate in Virginia and to offer academic programs from certificates through the doctoral level and also approved in Maryland to offer selected degrees through the master's level. For nearly 40 years, and under the same family leadership, Stratford University has a heritage and has thrived serving the needs of underrepresented students with little or no legacy of higher education in their families. This stability has enabled Stratford to hone its teaching methods, develop a strong academic student advising capacity, and offer curriculum that facilitates students grasping the importance of general education, critical thinking, and instills desire to complete their degrees as a path to better job opportunities and quality of life. These years of Stratford's commitment to minority education and experience as an accredited university in the national capital region have made Stratford a successful academic institution that knows how to serve the needs of all levels of students from various backgrounds.

In 2011, Stratford reached beyond Virginia and was approved to operate in Baltimore and has continuously provided competency-based programs to Maryland residents since its approval. The programs in both Maryland and Virginia fully meet standards for

liberal arts general education and maintain excellent student graduation and placement rates. Stratford's places strong focus on student retention and placement. Specifically, for the period from July 1, 2014 to June 30, 2015, the Stratford campus in Baltimore achieved a 64% year-over-year retention rate and it is climbing. For the same period, the placement rate for graduates was 81%. This placement rate is extraordinary given the fact that over 60% of our students had some type of non-violent criminal record and the fact that the Stratford campus is located just 3 blocks south of the Sojourner-Douglass College (SDC) main campus on Central Avenue. Our compassion, academic rigor, adept advising and community outreach have been the key reasons behind results that Stratford has achieved in Baltimore, and across all our campuses, to date.

When the Baltimore International College records were conveyed to Stratford University in 2011, Stratford ensured continuity of operations by properly taking accountability for all student academic records. This effort ensured transcripts could be provided to displaced students should they need them for employment reasons, continuing education, military service or other reasons. The experience gained for assuming custodial responsibility of records from a closed school is invaluable and extremely important for students.

Stratford University does not envision itself competing with MSU or other in-state schools. The goal of Stratford is not to take away from MSU or other school. Stratford simply sees the need to continue to provide employment relevant and quality education options to those students previously served by the former SDC. Stratford University intends continue to offer programs to these non-traditional students with a different type of background, as previously offered by SDC in order to ensure the continuation of the SDC educational legacy and, most importantly, prepare these students for greater employment opportunity. Stratford is not adding additional programs to the Baltimore community. Stratford desires to continue access by students to the former SDC programs that these SDC students found convenient and career rewarding.

SDC and MSU existed together for many years because they did not serve the same populations. Stratford does not directly target high school students. It does, however; require high school graduation as a condition of acceptance. The previous SDC class schedule is similar to what Stratford offers its older, more mature student body. This is purposely designed to accommodate these students' lifestyles and work schedules. Both SDC and Stratford serve military and international students.

As noted in Stratford's initial application, economists indicate most jobs are projected to be in the occupational clusters of hospitality and tourism, business management and administration, marketing and health sciences. This is also supported by information found in the US Bureau of Labor Statistics career outlook report. Furthermore, researchers such as Dr. Chauncy Lennon, Head of Workforce Initiatives at JPMorgan Chase also note "...employers are providing fewer opportunities for on-the-job training than they have in the past and as a result, the responsibility for developing skills is shifting from employers to job seekers." This shift creates an opportunity and imperative for universities like Stratford to deliver programs relevant to the skills needed

by disadvantaged workers and employers. This skills gap threatens Maryland's growth and holds back a workforce eager to learn new skills, be productive, and break the cycle of underemployed or not employed. Stratford believes its programs can address these shortfalls and Maryland residents given the opportunity to enter a career path and earn a good wage.

Also as noted in Stratford's initial application, Maryland is the home of three major federal government agencies headquarters including the Social Security Administration (estimated 60,000 employees), the US Department of Health and Human Services (estimated 76,000) and the National Security Agency/Central Security Service (estimated 40,000). All of the agencies provide career opportunities as business analyst, management program analyst, financial administrators, accountants, and human resource managers. These organizations are also heavily dependent on the use of information technology and provide career opportunities in the growing computer information technology fields. Stratford's programs prepare students with the knowledge and skills to be successful in these government career fields.

Maryland also is the home of other private and public companies like T. Rowe Price, Booz Allen Hamilton, Northrop Grumman, Lockheed Martin, Under Armour, Legg Mason and others. These companies provide career opportunities in management, finances, information technology, accounting, human resources and marketing. According to the Maryland Job Outlook, job opportunities as a personal financial advisor will grow by 39 percent and computer software engineers will grow by 49 percent. The report also indicates the top demanding occupations by education requirements will be operations managers, accountants, management analyst, computer software engineers and computer systems analysts.

With healthcare being Baltimore's largest employment sector there is a constant need for new and replacement workers who are qualified. As with any large employment sector there will be a large number of job openings and opportunities. Unfortunately, like most urban centers there exists a shortage of qualified workers to fill healthcare positions. This situation is also recognized by the Baltimore American Heart Association as reported in our initial application supporting documentation. Additionally, the 2011 report by the then governor O'Malley's Workforce Investment Board titled Preparing Maryland's Workforce for Healthcare Reform: Healthcare 2020 indicates a need to expand the need to increase primary care providers.

Although institutions across the country may offer similar programs, each institution has a different focus and student demographics. Stratford University's student demographics are generally identical to those students previously serviced by Sojourner Douglass College and with the demographics of the Baltimore MSA.

Stratford plans to offer employment to selected current SDC employees including faculty members and administrative personnel. These projected job offers do not appear to compete with human resources required staff by other local institutions as far as can be determined based on a review of the employment vacancies at other area institutions. It should also be noted Stratford has 11 firm nursing faculty member

commitment applications, several with credentials at the doctoral level ready to start working for Stratford. Stratford is not aware of nursing staff shortages at MSU and none of the 11 applications received by the Stratford Human Resources department are from employees who currently work at MSU.

Stratford, during the first academic half of 2015, also had 46 Maryland residents commuting to its Falls Church, Virginia campus to attend its nursing program. There is a well documented need, as known by our students and described in our initial application, for additional providers of nursing care services in Maryland.

Stratford also has signed clinical agreements with five Maryland organizations, and is actively engaged in 21 additional sites that may become operational with program approval.

Furthermore, approval of Stratford's application opens the door for Stratford to serve the future needs of underserved rural Maryland areas where no physical campuses exist. Stratford has extensive experience in operating satellite campuses that could be opened in rural areas with a large population of underserved communities. With the closure of the SDC satellite campuses several areas are now without conveniently available education.

Accreditation:

As MSU noted, Stratford University is accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). ACICS is a national accrediting body. Like regional accrediting bodies national accrediting bodies conduct comprehensive reviews of institutions and operate primarily throughout the United States, as do regional accrediting bodies. The ACICS is recognized by the Council for Higher Education Accreditation (CHEA) a national advocate and institutional voice for self-regulation of academic quality through accreditation, CHEA is an association of 3,000 degree-granting colleges and universities and recognizes 60 institutional and programmatic accrediting organizations. The Middle States Commission on Higher Education (MSCHE) is also CHEA recognized.

Other similarities exist between regionally accredited institutions as well as nationally accredited ones. Both can offer a wide range of programs including associate, baccalaureate, masters and/or doctoral degrees. Also, like regional accrediting bodies, the national grant of accreditation encompasses the main campus, branch campuses, other instructional sites, and online programs. Finally, in addition to CHEA recognition, the ACICS is fully recognized by the United States Department of Education (USDE) and the Department of Veterans Affairs (VA). Also, as an ACICS institution, Stratford is held to rigorous retention and placement standards it must meet. Many accrediting bodies do not have a standing definition of placement to which the institution could refer. ACICS does have such a definition and calculation formula. This concept of placement standards is being strongly considered by the USDE for broader application.

In addition to the ACICS accreditation, Stratford maintains additional accreditations. Its nursing program is accredited by the Commission on Collegiate Nursing Education (CCNE). Like the MSCHE and ACICS the CCNE is officially recognized by CHEA and the U.S. Secretary of Education as a national accreditation agency. The CCNE is an autonomous accrediting agency, contributing to the improvement of the public's health. CCNE ensures the quality and integrity of baccalaureate, graduate, and residency programs in nursing. Stratford University is accredited by the CCNE as are other schools in Maryland (e.g. Johns Hopkins; Towson; Stevenson; Frostburg State; and others).

The Stratford Culinary Arts program is accredited by the American Culinary Federation Education Foundation (ACFEF). Accreditation by American Culinary Federation Education Foundation) assures that a program is meeting standards and competencies set for faculty, curriculum and student services. ACFEF is also recognized by CHEA.

Stratford University has also applied to Accrediting Bureau of Health Education Schools (ABHES). The application has been accepted by ABHES and the evaluation team site visits to our campuses have been completed. Stratford expects ABHES accreditation to be awarded this summer. As a leader in health education accreditation for over 40 years, ABHES has been nationally recognized by the U.S. Secretary of Education as a private, non-profit, independent accrediting agency since 1968. It has been at the forefront of advancing the quality of health education programs throughout the country.

Stratford is also a member of the National Council for State Authorization Reciprocity Agreements (NC-SARA). Stratford understands from a posting on the NC-SARA website that Maryland has introduced and passed legislation for Maryland to join the council. Being a member of SARA indicates a willingness to accept institutional accreditation by an accrediting body recognized by the U.S. Secretary of Education as sufficient, initial evidence of academic quality for approving institutions for participation in SARA.

Stratford has also put a team together to pursue Southern Association of Colleges and Schools Commission on Colleges (SACS) accreditation and will be submitting its application in January, 2016. SACS is the regional body for the accreditation of degree-granting higher education institutions in the Southern states. It serves as the common denominator of shared values and practices among the diverse institutions in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, Virginia and Latin America and other international sites approved by the Commission on Colleges that award associate, baccalaureate, master's, or doctoral degrees.

Stratford is indeed also considering applying for the Association to Advance Collegiate Schools of Business (AACSB).

Vision and Mission:

Both the Stratford and SDC visions and missions are similar. SDC was founded out of a movement of community leaders and organizations to create a community-based educational system to address the needs of underserved adult learners. Stratford's vision and mission is to serve a diverse student body by providing relevant programs that meet the needs of employers and learners. Stratford University provides access to underserved geographic and demographic groups and by providing affordable, quality education to its students. Stratford and SDC both draw students generally from the adult population using programs, courses and individual help designed to stimulate the motivation of students and enhance the student's development of positive images. In both cases the average student is a person in his or her early/mid-thirties that is simultaneously the head of a household and the primary breadwinner, whose previous experiences with education have been uneven and oftentimes unfulfilling.

In pursuit of this vision and mission, Stratford seeks to ensure:

1. a student's career goals can be met by matching students with appropriate programs of study;
2. a quality learning experience by employing faculty who are committed to learning and who demonstrate excellent teaching skills;
3. relevant curricula through input from the governing board, advisory boards, academic partners and graduates;
4. student success through a comprehensive support program (including testing) to assure correct placement in courses, financial planning, academic assistance, and other needed resources.

Stratford University focuses its energies on changing lives, one student at a time. The human spirit has great resilience and capacity to adapt, learn, and aspire. As did SDC, Stratford believes that education can lift the human spirit and provide hope for a brighter future. By providing a path to a successful career, education builds self-esteem and self-reliance. In so doing, education addresses the hopelessness which many believe is the root cause of violent behavior.

Finally, please note that Stratford has applied for classification as a for-benefit corporation within the Commonwealth of Virginia. Stratford has elected to provide specific public benefits, which serve one or more public welfare, religious, charitable, scientific, literary, or educational purposes, or other purpose or benefit beyond the strict interest of the shareholders, including, but not limited to, the following:

- To create and deliver quality, educational programs that meet the needs of employers in high demand professions;
- To prepare students to communicate effectively, think clearly, and act ethically to solve problems in diverse environments;
- To inspire and guide students as they master the competencies required for career success and life-long learning;
- To be a safe haven where all races, religions, and cultures can communicate and work together for the common good;

- To meet the social and economic needs of the community by empowering its citizens to become contributing members of the workforce;
- To make higher educational available to underserved geographic and demographic groups.

Stratford is committed to the quality of life within the communities that we serve. Our corporate for-benefit mission supports that commitment. Our non-profit sister organization, The Stratford University Foundation, reinforces this vision.

In conclusion, Stratford University believes its plan for continuation of the former SDC programs does not duplicate those offered by MSU and are consistent with the needs of Maryland residents and the State's goal to have at least 55% of Maryland residents age 25-64 holding at least one degree credential by 2025. Just as Stratford did in 2011 with the approval of its initial Baltimore campus, Stratford believes it can fill an important role serving the needs of Baltimore.

Thank you again for this opportunity to respond and I look forward to a favorable consideration by the Secretary to this request.

Sincerely,

A handwritten signature in cursive script that reads "R. Shurtz, II" with "for" written below it.

Richard R. Shurtz, II, PhD
President