



March 15, 2023

The Honorable Miguel Cardona
Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

RE: Docket ID ED-2023-OPE-0030

Dear Secretary Cardona:

For 156 years, Morehouse College has produced innovators and leaders who are men of distinction, making a lasting impact on the world.

Today, there are more than 39 million Americans that have some college credit, but no credential. Black men are overrepresented in this population relative to their share of currently enrolled undergraduate students.¹ At the same time, securing a bachelor's degree continues to be one of the clearest pathways to career advancement in the U.S. All of higher education has an imperative to increase access and affordability for this population. As a Historically Black College, our institution has played an integral role in this space by expanding access to our distinctive undergraduate education.

In 2021, Morehouse launched an online B.A. in Business Administration designed to put more Black men on a path to completing their bachelor's degree and pursue leadership positions that drive economic and social change. This has opened our doors to highly qualified students beyond our campus borders whose life circumstances prevent them from joining us in person. Students in our program currently reside in over 35 states—the majority of whom live outside of Georgia. Our online student body consists of students with an average age of 40, and over 16 percent come from a military background. In these programs, students have the same requirements, follow the same curriculum, and learn from the same renowned faculty as on-campus students.

We developed this program through a partnership with 2U, who have been critical partners in our efforts to bring Morehouse to students around the country. As a result of this arrangement, we were able to launch Morehouse Online in half a year, bringing a Morehouse education to

1. Causey, J., Kim, H., Ryu, M., Scheetz, A., & Shapiro, D. (May 2022), Some College, No Credential Student Outcomes, Annual Progress Report - Academic Year 2020/21, Herndon, VA: National Student Clearinghouse Research Center.

over 550 students from across the country who would not otherwise have benefited from our school's mission. Because of this scale and the benefits of the online modality, we have been able to dramatically reduce tuition rates to half the cost-per-credit when compared to the on-campus program.

A revenue share partnership makes all of this possible. Our college has advanced its strategic goal of Morehouse Beyond Borders by benefiting from 2U's knowledge of online education delivery and financial investment. 2U has provided access to multiple services necessary for delivering the Morehouse Online educational experience, including non-academic student guidance, learning design, marketing, recruiting, application and enrollment technology, live classroom technology, cybersecurity, compliance, learning analytics, and more. These services occur in collaboration with various Morehouse offices, faculty, and staff but would be very difficult to implement on our own, especially as we launched and grew Morehouse Online.

The revenue share model also directly aligns 2U's incentives with strong student retention and outcomes. 2U only shares in tuition as students progress through the program and graduate. As a result, 2U invests heavily in a student-centered online learning environment and retention services including one-on-one advising, tutoring services, mental health resources, and more.

Institutional independence, oversight, and accountability is at the foundation of our partnership. Our college maintains full control over tuition pricing, accreditation, curriculum, admissions standards and acceptance decisions, graduation requirements, faculty hiring decisions, student instruction, program size, and financial aid decisions. We also approve all marketing assets and collateral.

Through a partnership between 2U and [One Ten](#), a coalition of executives committed to upskilling, hiring, and advancing one million Black Americans into family-sustaining jobs, we have extended over \$100,000 in scholarships to nearly 50 deserving and qualified students in our online program.

We welcome the Department's efforts to achieve greater transparency in these arrangements, but institutions should have the flexibility to choose from a wide range of financial models, including revenue share, when seeking a digital partner. A range of models gives our institution the ability to find a partner suited for each unique program and its anticipated scale. This choice is essential in driving innovation, access, and affordability in the higher education ecosystem.

Morehouse College is the only institution in the nation dedicated to empowering and developing Black men—a mission that now extends online and across the globe. Partnerships with companies like 2U ensure we can keep our programs high-quality, accessible, and affordable for years to come.

Sincerely,

A handwritten signature in black ink that reads "David A. Thomas". The signature is written in a cursive style with a large, stylized 'D' and 'T'.

David A. Thomas
President

Morehouse College
830 Westview Drive SW
Atlanta, GA 30314