

ALLEGANY COLLEGE  
of MARYLAND

September 21, 2017

Dr. Emily Dow  
Maryland Higher Education Commission  
Division of Planning and Academic Affairs  
6 N. Liberty St., 10th Floor  
Baltimore, MD 21201

Dear Dr. Dow,

Please accept this letter in response to the application submitted by Standard Healthcare Services to operate as an Out-of-State institution for an Associate of Applied Science (A.A.S.) in Nursing (LPN to RN). Cecil College is concerned that the approval of this program would represent unreasonable program duplication in the state of Maryland and would cause demonstrable harm to the enrollment of nursing programs across the state.

COMAR 13B.02.01.06 indicates that an Out-of-State institution must meet a compelling or critical regional or Statewide need. With seats available in many community colleges, across the state, it is difficult to believe that a compelling or critical needs exists for LPN to RN education. Currently, there are fifteen community college nursing programs in the state of Maryland. All fifteen operate a LPN to RN transition program, providing a pathway for currently licensed practical nurses to transition to an Associate of Science Degree program, with several programs admitting students twice per year. These programs are offered in a variety of formats, to meet varying needs of students. This includes in-person and online options, where students can complete the clinical requirements in their community. Many of these programs do not reach their capacity for enrollment, creating existing options for students across the state. Specific to Cecil College, the LPN to RN transition is a 12 month program that offers several options to try to meet student needs related to work and family commitments. The program runs every year and often has seats, unfilled, that are available to qualified applicants.

As you are aware, nursing education demands a significant amount of time spent in various clinical settings. As nursing education programs across the state, both Associate and Bachelor's degree have increased their enrollments to meet workforce needs, availability of clinical education sites has become increasingly limited. And in some cases, limited clinical availability inhibits nursing programs from accepting more students. An educational institution, that is working to place students in clinical in Maryland would further restrict nursing programs currently in place across the state, potentially leading to decreased enrollments related to lack of clinical placement opportunities, creating harm to the enrollment of existing two-year and four-year educational institutions across the state.

Academic progression for nursing students has been identified as critical by two nationally recognized reports. The seminal report *The Future of Nursing: Leading Change, Advancing Health* (2011) and the follow-up report, *Assessing Progress on the IOM Report The Future of Nursing* (2015), advocate for clear, seamless academic progression for nursing education, particularly from the Associate degree to Bachelor's degree. Unfortunately, graduates from the Standard Healthcare Services program would face two significant hurdles related to academic progression.

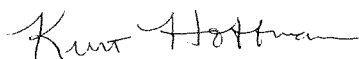
The Associate of Applied Science is recognized as a terminal degree and does not include much of the foundational coursework included in an Associate of Science degree. This would require graduates of this program to take more foundation courses and additional credits, at an additional cost, to progress to a BSN program.

Additionally, a nationally recognized requirement for many colleges and universities is for students to graduate from an accredited nursing program, meaning that students will only be accepted into BSN programs of study if they graduated from an accredited nursing program. There are currently three nursing accrediting organizations: Accreditation Commission for Education in Nursing (ACEN); Commission on Collegiate Nursing Education (CCNE); and the newly formed Commission for Nursing Education Accreditation (CNEA). Standard Healthcare Services is not accredited by any of the nationally recognized nursing accrediting bodies. This could have a long-term impact on the graduates of this program, limiting their opportunities to progress in their nursing education, and thus the workforce.

COMAR 13B.02.01.06 indicates that occupational needs relative to meeting workforce requirements or upgrading vocational or technical skills should be demonstrated by the Out-of-State institution applying for approval. Individuals who graduate from an AAS degree program that does not currently hold nursing program accreditation, would face significant barriers related to academic program progression and meeting the intent of COMAR 13B.02.01.06 related to workforce requirements and upgrading skills.

As always, community college remain committed to meeting the needs of our communities responsibly and proactively. Thank you for the opportunity to provide feedback on the proposal from Standard Healthcare Services. If you need any further information, please do not hesitate to contact me.

Sincerely,



Dr. Kurt Hoffman  
Senior Vice President of Instructional and Student Affairs  
Allegany College of Maryland  
301-784-5287  
[khoffman@allegany.edu](mailto:khoffman@allegany.edu)



# ANNE ARUNDEL COMMUNITY COLLEGE

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**Dr. Dawn Lindsay**

*President*

410-777-1177

Fax: 410-777-4222

[dslindsay@aacc.edu](mailto:dslindsay@aacc.edu)

September 5, 2017

Emily A. A. Dow, Ph.D., Assistant Secretary for Academic Affairs  
The Maryland Higher Education Commission

Dear Dr. Dow,

Thank you for the opportunity to comment on the Standard Healthcare Services Inc, College of Nursing (Standard College) proposal requesting to operate in the State of Maryland to provide experiential learning components as part of its LPN to RN program.

Anne Arundel Community College objects to the Standard College proposal based on "...unreasonable program duplication which would cause demonstrable harm to another institution," the third criterion for raising objections to program proposals. The principal reason for this objection is the negative impact that clinical rotations through Standard College will have on our Nursing program's ability to place students in clinical sites for clinical courses. Any loss of clinical sites and mastery of clinical competencies will jeopardize the ability of our students to successfully complete the clinical education component of our program and ultimately impact our accreditation status.

Accredited nursing programs are already competing for a limited number of clinical agencies and space on the floor to train students. This limitation challenges accredited and MHEC approved programs to meet the required clinical hours for course outcomes and be prepared for success on the RN-NCLEX and for employment. Clinical agencies limit the number of students permitted on a unit during a shift and, in some cases, have denied access to the unit due to high staff turnover. Allowing additional students from an out-of-state program to compete for limited clinical education space will create increased hardship for AACC's nursing program and other existing nursing programs in Maryland.

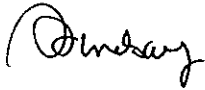
Anne Arundel Community College (AACC) has been approved for a new Health Sciences building to be completed in 2021; with this building there is an expectation of doubling the number of students admitted to the nursing program. In order to continue our successful program we need to work with our existing clinical partners

as well as develop new partnerships throughout the region. To meet our clinical requirements, we rely heavily on our county partners, but also need to send students to other counties in Maryland, including Howard, Prince George's, Baltimore, Calvert, and Talbot, as well as to Baltimore City.

We strongly disagree with Standard College's statement that there would be no "duplication of the educational nursing programs at the Community Colleges in Maryland." AACC offers highly ranked LPN and RN programs and an advanced placement for LPN to RN transition. AACC admits 8-10 LPN's twice a year who then assimilate into our RN program. The LPN to RN program offers a didactic component that can be completed online with evening and weekend clinical options. Further, AACC's tuition is \$110/credit, versus the \$500-\$700/credit at Standard College, which gives students a more reasonable cost-effective option for completing their degree in the state of Maryland.

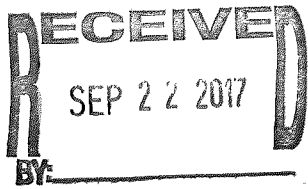
We urge MHEC to consider these comments in the decision to reject the application from Standard Healthcare Inc. College of Nursing to operate as an out-of-state institution in Maryland.

Sincerely,



Dr. Dawn Lindsay  
President

cc: Elizabeth H. Appel, MSW, LCSW-C, Dean, School of Health Sciences  
Beth Anne Batturs-Martin, M.S.N., RN, Director, Nursing Department



September 19, 2017

Dr. Emily Dow  
Maryland Higher Education Commission  
Division of Planning and Academic Affairs  
6 North Liberty Street, 10<sup>th</sup> Floor  
Baltimore, Maryland 21201

Dear Dr. Dow:

Carroll Community College objects to the application of Standard Healthcare Services, Inc. College of Nursing to operate in the State of Maryland. Of the 15 Associate Degree Nursing Programs in Maryland, all include a LPN to RN Transition program and five of these programs admit to the Transition cohort twice a year. Admission is selective and competitive as students must meet minimum requirements to facilitate their success; however, capacity is not reached by all programs. It is estimated that the current capacity for LPN to RN Transition programs is over 265 students. Therefore, the Standard Healthcare Services, Inc. proposal is in direct competition with existing programs. Furthermore, the Associate of Applied Science degree offered by Standard Healthcare Services is considered a terminal degree and does not contain the courses that assist in seamless transition to bachelor degree programs.

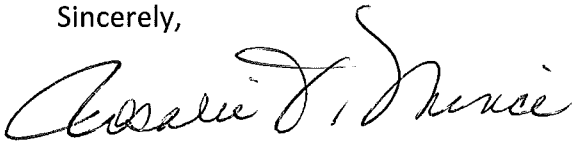
Perhaps the greatest reason for objection to this new program is its cost. The costs of existing Community College programs are manageable for students, with costs ranging from \$107 to \$191 per credit in state, versus approximately **\$500 to \$700** per credit at Standard Healthcare Service, Inc. Options for flexible student schedules exist in the Maryland Community Colleges. An evening/weekend option and an online/hybrid option are available to student for two of the three semesters required for the Transitional program in one of Maryland's largest Community College Nursing Programs. Academic Progression to the Bachelors of Science degree in nursing exist for LPN to RN transition students in many Maryland community college nursing programs, which ultimately represent incredible value and saving in time and costs.

Another serious problem is that all of the Maryland Community Colleges already have a great challenge with locating clinical sites. Clinical site capacity is perhaps the most difficult challenge to nursing program enrollments in Maryland. Placements for LPN students is already restricted in many Maryland acute and long-term care facilities. Allowing additional students from an

Dr. Emily Dow  
September 18, 2017  
Page Two

out-of-state program to compete for limited clinical education space will create increased hardship for existing LPN, Associate, and Bachelor's degree nursing program in Maryland. Introduction of another LPN to RN program into Maryland clinical facilities will represent unreasonable program duplication and inflict harm on existing nursing programs. I urge MHEC to seriously weigh these concerns as the Commission deliberates on the appropriateness of adding further competition to the State's approved Nursing Programs.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rosalie V. Mince".

Rosalie V. Mince, Ph.D  
Vice President of Academic and Student Affairs  
Carroll Community College.



September 19, 2017

Dr. Emily Dow  
Maryland Higher Education Commission  
Division of Planning and Academic Affairs  
6 N. Liberty Street  
Baltimore, Maryland 21201

Dear Dr. Dow,

I am writing on behalf of the Community College of Baltimore County in opposition to the application of Standard Healthcare Services, Inc. College of Nursing to operate in the State of Maryland. This opposition is based on unreasonable program duplication which would cause demonstrable harm to another institution. Clinical site placement for Practical Nursing (PN) and Licensed Practical Nursing (LPN) to Registered Nursing (RN) transition students is highly competitive in the State of Maryland. Allowing additional students from an out-of-state program to compete for these clinical locations will create hardship for all existing nursing programs in the state (PN, LPN to RN, Associate degree and Bachelor degree).

CCBC is concerned with the misrepresentation in the application proposed by Standard Health Care Services regarding the number and availability for Licensed Practical Nursing to Registered Nursing (LPN to RN) transition programs currently offered in Maryland. Of the fifteen Associate Degree in Nursing programs in Maryland community colleges, all include an LPN to RN transition program. Furthermore, six of these programs produce two cohorts of new students each academic year. CCBC has a strong LPN to RN transition program that includes a selective and competitive admissions process which students must meet in order to achieve success. Our program provides the largest enrollment capacity in the state for up to forty qualified students per year. Additional competition for clinical site education space by an out-of-state program will result in hardship for both CCBC and other community colleges within the state.

The Community College of Baltimore County's LPN to RN transition program, along with other Maryland community college transition programs, leads to an Associate of Science degree which provides graduates the opportunity to transfer to Baccalaureate of Science in Nursing (BSN) degree programs. The Associate of Applied Science (AAS) that is proposed by Standard Healthcare Services is considered a terminal degree, eliminating seamless transfer to bachelor degree level programs. In addition, CCBC offers the Associate to Bachelor's (ATB) program, providing students the opportunity to earn the ASN and BSN degrees in concurrent semesters. Students in CCBC's LPN to RN transition program are encouraged to apply for the ATB program, providing additional opportunity for stackable credentials in the nursing profession.

443-840-CCBC (2222)

**CCBC Catonsville**

800 South Rolling Road  
Baltimore, Maryland  
21228

**CCBC Dundalk**

7200 Sollers Point Road  
Baltimore, Maryland  
21222

**CCBC Essex**

7201 Rossville Boulevard  
Baltimore, Maryland  
21237

**CCBC Hunt Valley**

11101 McCormick Road  
Suite 100  
Hunt Valley, Maryland  
21031

**CCBC Owings Mills**

10300 Grand Central Avenue  
Owings Mills, Maryland  
21117

**CCBC Randallstown  
at The Liberty Center**

3637 Offutt Road  
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21133

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Finally, CCBC offers an affordable nursing program. The current CCBC tuition is \$120 per credit compared to Standard Healthcare Service's charges of approximately \$500 to \$700 per credit. CCBC provides an incredible value to students in both the PN and LPN to RN transition programs, a trend seen throughout nursing programs within the Maryland community colleges. The introduction of another LPN to RN transition program into Maryland clinical facilities, the importance of providing students with an associate's degree that will transfer to bachelor degree programs and the value of this degree from an economic perspective provide the basis for our opposition to the proposed program. We urge MHEC to consider these comments with respect to the application from Standard Healthcare Inc. College of Nursing.

Sincerely,



Mark McColloch  
Vice President of Instruction

cc: Dr. Shawn McNamara, Dean  
Dr. Mary Kay DeMarco  
Dr. Jennifer Kilbourne



September 21, 2017

Dr. Emily Dow  
Maryland Higher Education Commission  
Division of Planning and Academic Affairs  
6 N. Liberty St., 10th Floor  
Baltimore, MD 21201

Dear Dr. Dow,

Please accept this letter in response to the application submitted by Standard Healthcare Services to operate as an Out-of-State institution for an Associate of Applied Science (A.A.S.) in Nursing (LPN to RN). Cecil College is concerned that the approval of this program would represent unreasonable program duplication in the state of Maryland and would cause demonstrable harm to the enrollment of nursing programs across the state.

COMAR 13B.02.01.06 indicates that an Out-of-State institution must meet a compelling or critical regional or Statewide need. With seats available in many community colleges, across the state, it is difficult to believe that a compelling or critical needs exists for LPN to RN education. Currently, there are fifteen community college nursing programs in the state of Maryland. All fifteen operate a LPN to RN transition program, providing a pathway for currently licensed practical nurses to transition to an Associate of Science Degree program, with several programs admitting students twice per year. These programs are offered in a variety of formats, to meet varying needs of students. This includes in-person and online options, where students can complete the clinical requirements in their community. Many of these programs do not reach their capacity for enrollment, creating existing options for students across the state. Specific to Cecil College, the LPN to RN transition is a 12 month program that offers several options to try to meet student needs related to work and family commitments. The program runs every year and often has seats, unfilled, that are available to qualified applicants.

As you are aware, nursing education demands a significant amount of time spent in various clinical settings. As nursing education programs across the state, both Associate and Bachelor's degree have increased enrollment to meet workforce needs, availability of clinical education sites has become increasingly limited. And in some cases, limited clinical availability inhibits nursing programs from accepting more students. An educational institution, that is working to place students in clinical in Maryland would further restrict nursing programs currently in place across the state, potentially leading to decreased enrollments related to lack of clinical placement opportunities, creating harm to the enrollment of existing two-year and four-year educational institutions across the state.

Academic progression for nursing students has been identified as critical by two nationally recognized reports. The seminal report *The Future of Nursing: Leading Change, Advancing Health* (2011) and the follow-up report, *Assessing Progress on the IOM Report The Future of Nursing* (2015), advocate for clear, seamless academic progression for nursing education, particularly from the Associate degree to

Bachelor's degree. Unfortunately, graduates from the Standard Healthcare Services program would face two significant hurdles related to academic progression.

The Associate of Applied Science is recognized as a terminal degree and does not include much of the foundational coursework included in an Associate of Science degree. This would require graduates of this program to take more foundation courses and additional credits, at an additional cost, to progress to a BSN program.

Additionally, a nationally recognized requirement for many colleges and universities is for students to graduate from an accredited nursing program, meaning that students will only be accepted into BSN programs of study if they graduated from an accredited nursing program. There are currently three nursing accrediting organizations: Accreditation Commission for Education in Nursing (ACEN); Commission on Collegiate Nursing Education (CCNE); and the newly formed Commission for Nursing Education Accreditation (CNEA). Standard Healthcare Services is not accredited by any of the nationally recognized nursing accrediting bodies. This could have a long-term impact on the graduates of this program, limiting their opportunities to progress in their nursing education, and thus the workforce.

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As always, community college remain committed to meeting the needs of our communities responsibly and proactively. Thank you for the opportunity to provide feedback on the proposal from Standard Healthcare Services. If you need any further information, please do not hesitate to contact me.

Sincerely,



Christy Dryer, DNP, RN, CNE  
Vice-President of Academic Programs  
Cecil College



Dr. Emily Dow  
Maryland Higher Education Commission  
Division of Planning and Academic Affairs  
6 N. Liberty St., 10th Floor  
Baltimore, MD 21201

September 21, 2017

Dear Dr. Dow,

Please accept this letter in response to the application submitted by Standard Healthcare Services to operate as an Out-of-State institution for an Associate of Applied Science (A.A.S.) in Nursing (LPN to RN). The College of Southern Maryland (CSM) is concerned that the approval of this program would represent unreasonable program duplication in the state of Maryland and would cause demonstrable harm to the enrollment of nursing programs across the state.

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As you are aware, nursing education demands a significant amount of time spent in various clinical settings. As nursing education programs across the state, both Associate and Bachelor's degree have increased their enrollments to meet workforce needs, availability of clinical education sites has become increasingly limited. And in some cases, limited clinical availability inhibits nursing programs from accepting more students. An educational institution, that is working to place students in clinical in Maryland would further restrict nursing programs currently in place across the state, potentially leading to decreased enrollments related to lack of clinical placement opportunities, creating harm to the enrollment of existing two-year and four-year educational institutions across the state.

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follow-up report, *Assessing Progress on the IOM Report The Future of Nursing (2015)*, advocate for clear, seamless academic progression for nursing education, particularly from the Associate degree to Bachelor's degree. Unfortunately, graduates from the Standard Healthcare Services program would face two significant hurdles related to academic progression.

The Associate of Applied Science is recognized as a terminal degree and does not include much of the foundational coursework included in an Associate of Science degree. This would require graduates of this program to take more foundation courses and additional credits, at an additional cost, to progress to a BSN program.

Additionally, a nationally recognized requirement for many colleges and universities is for students to graduate from an accredited nursing program, meaning that students will only be accepted into BSN programs of study if they graduated from an accredited nursing program. There are currently three nursing accrediting organizations: Accreditation Commission for Education in Nursing (ACEN); Commission on Collegiate Nursing Education (CCNE); and the newly formed Commission for Nursing Education Accreditation (CNEA). Standard Healthcare Services is not accredited by any of the nationally recognized nursing accrediting bodies. This could have a long-term impact on the graduates of this program, limiting their opportunities to progress in their nursing education, and thus the workforce.

COMAR 13B.02.01.06 indicates that occupational needs relative to meeting workforce requirements or upgrading vocational or technical skills should be demonstrated by the Out-of-State institution applying for approval. Individuals who graduate from an AAS degree program that does not currently hold nursing program accreditation, would face significant barriers related to academic program progression and meeting the intent of COMAR 13B.02.01.06 related to workforce requirements and upgrading skills.

As always, community colleges remain committed to meeting the needs of our communities responsibly and proactively. Thank you for the opportunity to provide feedback on the proposal from Standard Healthcare Services. If you need any further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Eileen Abel".

Eileen Abel  
Vice President of Academic Affairs  
College of Southern Maryland





September 21, 2017

Dr. Emily Dow  
Maryland Higher Education Commission  
Division of Planning and Academic Affairs  
6 N. Liberty St., 10th Floor  
Baltimore, MD 21201

Dear Dr. Dow,

Please accept this letter in response to the application submitted by Standard Healthcare Services to operate as an Out-of-State institution for an Associate of Applied Science (A.A.S.) in Nursing (LPN to RN). Frederick Community College is concerned that the approval of this program would represent unreasonable program duplication in the state of Maryland and would cause demonstrable harm to the enrollment of nursing programs across the state.

COMAR 13B.02.01.06 indicates that an Out-of-State institution must meet a compelling or critical regional or Statewide need. With seats available in many community colleges, across the state, it is difficult to believe that a compelling or critical needs exists for LPN to RN education. Currently, there are fifteen community college nursing programs in the state of Maryland. All fifteen operate a LPN to RN transition program, providing a pathway for currently licensed practical nurses to transition to an Associate of Science Degree program, with several programs admitting students twice per year. These programs are offered in a variety of formats, to meet varying needs of students. This includes in-person and online options, where students can complete the clinical requirements in their community. Many of these programs do not reach their capacity for enrollment, creating existing options for students across the state.

As you are aware, nursing education demands a significant amount of time spent in various clinical settings. As nursing education programs across the state, both Associate and Bachelor's degree have increased their enrollments to meet workforce needs; availability of clinical education sites has become increasingly limited. In some cases, limited clinical availability inhibits nursing programs from accepting more students. An out of state educational institution, that is working to place students in clinical sites in Maryland would further restrict nursing programs currently in place across the state, potentially leading to decreased enrollments related to lack of clinical placement opportunities, creating harm to the enrollment of existing two-year and four-year educational institutions across the state.

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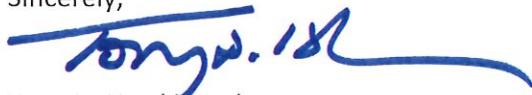
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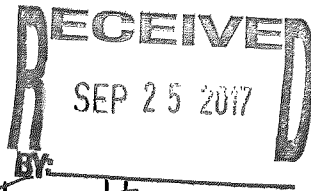
Sincerely,

A handwritten signature in blue ink, appearing to read "Tony D. Hawkins", with a long horizontal flourish extending to the right.

Tony D. Hawkins, Ph.D.  
Provost/Vice-President for Academic Affairs  
Frederick Community College



You Can Get There From Here.



10901 Little Patuxent Parkway  
Columbia, MD 21044-3197  
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September 21, 2017

Dr. Emily Dow  
Maryland Higher Education Commission  
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6 N. Liberty St., 10th Floor  
Baltimore, MD 21201

Dear Dr. Dow,

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As always, community college remain committed to meeting the needs of our communities responsibly and proactively. Thank you for the opportunity to provide feedback on the proposal from Standard Healthcare Services. If you need any further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Jean Svacina". The signature is written in a cursive, flowing style.

Jean Svacina, Ph.D.

Vice President of Academic Affairs  
Howard Community College





## Maryland Association of Associate Degree Nursing Directors

September 15, 2017

Dr. Emily Dow  
Maryland Higher Education Commission  
Division of Planning and Academic Affairs  
6 N. Liberty St., 10<sup>th</sup> Floor  
Baltimore, MD 21201

Dear Dr. Dow,

The Maryland Association of Associate Degree Nursing Directors (MAADND) submits the following comments on the application of Standard Healthcare Services, Inc. College of Nursing to operate in the State of Maryland. We were dismayed at the misinformation documented in the application and we wish to clarify the state of Licensed Practical Nursing to Registered Nursing (LPN to RN) Transition programs currently existing in the State. Of the 15 Associate Degree Nursing Programs in Maryland, all include an LPN to RN Transition program and five of these programs admit to the Transition cohort twice a year. Admission is selective and competitive as students must meet minimum requirements to facilitate their success; however, capacity is not reached by all programs. It is estimated that the current capacity for LPN to RN Transition programs is over 265 students.

All Maryland Community College Nursing Programs are focused on service to our communities and benefits for working students with families. Maryland Community College LPN to RN Transition programs lead to the Associate of Science degree, a degree designed for transfer to the Baccalaureate of Science in Nursing (BSN) degree programs. This tract follows best practices as outlined by the Institute of Medicine Report on the Future of Nursing, and supported by the Maryland Action Coalition for Nursing, a coalition of education, practice and consumer stakeholders. The Associate of Applied Science (offered by Standard Healthcare Services) is considered a terminal degree and typically does not contain the courses that assist in seamless transition to bachelor degree programs.

The costs of existing Community College programs are also financially feasible for students with family obligations, with costs ranging from **\$107 to \$191** per credit in state, versus approximately **\$500 to \$700** per credit at Standard Healthcare Services, Inc. Options for flexible student schedules do exist in the Maryland Community Colleges. An evening /weekend option and an online/hybrid option are available to students for two of the three semesters required for the Transition program in one of Maryland's largest Community College Nursing Programs. Academic Progression to the Bachelors of Science degree in nursing exists for LPN to RN transition students in many Maryland community college nursing programs, which ultimately represents incredible value and savings in time and costs.



## Maryland Association of Associate Degree Nursing Directors

Clinical site capacity is perhaps, the most difficult challenge to nursing program enrollments in Maryland. Placements for LPN students is already restricted in many Maryland acute and long-term care facilities. Allowing additional students from an out-of-state program to compete for limited clinical education space will create increased hardship for existing LPN, Associate, and Bachelor's degree nursing programs in Maryland. Introduction of another LPN to RN program into Maryland clinical facilities will represent unreasonable program duplication and inflict harm on existing nursing programs. We urge MHEC to consider these comments in the decision to accept the application from Standard Healthcare Inc. College of Nursing.

Sincerely Yours,

*Nancy N. Perry, DNP, RN, CNE*

Nancy N. Perry, DNP, RN, CNE  
President, MAADND