

received
9/27/2016



HOWARD

COMMUNITY COLLEGE

You Can Get There From Here.

10901 Little Patuxent Pkwy.
Columbia, MD 21044-3197
443-518-1000
www.howardcc.edu

September 20, 2016

James D. Fielder, Jr., Ph.D.
Secretary of Higher Education
Maryland Higher Education Commission
6 North Liberty St.
Baltimore, MD 21201

Dear Dr. Fielder:

This letter is being written in response to Montgomery College's request to deny approval of Howard Community College's (HCC) diagnostic medical sonography's (DMS) vascular certificate. Howard Community College requests that consideration be given to several facts that were misrepresented in Montgomery College's objection. To clarify, HCC's proposed vascular certificate program is not a duplication of the Montgomery College vascular sonography program. HCC's proposed vascular certificate program will neither have a negative impact on the job market, nor sonography student clinical site placements. The new vascular certificate option to be offered by HCC proposes a unique and valuable opportunity for existing registered sonographers to expand their specialty certification and marketability.

Program Duplication

The newly proposed vascular certificate of HCC is not a duplicate of existing programs. It also is not an entry-level sonography program for students who have no prior experience. The other sonography programs in the area are Montgomery College, University of Maryland Baltimore County (UMBC), and Johns Hopkins School of Medical Imaging (JHMI). Among them, UMBC and JHMI offer certificate programs, and Montgomery College is an associate degree program. Both of the certificate programs require applicants to already have an associate degree, and applicants from other disciplines besides ultrasound are able to apply for acceptance. All other programs in the state are designed for individuals seeking to become entry-level sonographers. HCC's proposed certificate option is for existing nationally credentialed sonographers who wish to become specialized in vascular sonography, which will be different from their current specialty.

Admission to the HCC diagnostic medical sonography vascular certificate option is different from the other programs. It is based upon the student's successful completion of a *Commission on Accreditation of Allied Health Education Programs* (CAAHEP) accredited diagnostic medical sonography program, proof of current national registry certification, and proof of recent professional practice in a clinical setting. Applicants must provide proof of recent professional

practice that must have occurred no later than two years prior to admission to the certificate option.

The targeted job market of the HCC diagnostic medical sonography vascular certificate option is also different from others. While all other programs are intended to yield new entry-level sonographers, the proposed program is intended to supply experienced registered sonographers to multi-specialty ultrasound lab facilities, which desire sonographers who possess more than one specialty in ultrasound practice.

Unlike the programs offered at Montgomery College, UMBC and JHMI, the proposed program at HCC is specifically designed to assist DMS degree program graduates and currently registered sonographers in gaining an additional specialty. There is no other sonography program, either certificate or degree level, offering this specialized training for existing professional sonographers within the state of Maryland, as well as nearby Pennsylvania, Virginia, West Virginia, Delaware, and Washington, D.C.

During 2015, HCC's DMS program conducted a survey of clinical sonographers based on the premise that existing registered sonographers currently have limited options for educational opportunities that will allow them to gain enough experience in another ultrasound specialty area to acquire certification. The survey results represented views of certified sonographers from all three major ultrasound disciplines, including cardiac, general, and vascular sonography. The majority of sonographers (80%) indicated a desire to attend a training program specifically designed to cross-train them in another specialty ultrasound area. The proposed vascular certificate option would be able to meet this specific need by offering an accelerated six-month completion, flexibility of scheduling coursework and lab experiences during evening and weekend hours, and limited clinical time of only 16 hours per week. These features provide ease of access and meet the needs of the working student.

Impact on Job Market

The proposed vascular certificate option will not negatively impact the job market, but provide expanded opportunities for existing sonographers. It is designed to help existing working sonographers already in the field to expand their careers and become more marketable by providing additional skills necessary for cross-training. It does not accept enrollment of new students who have no prior training or experience in sonography, unlike other certificate and associate degree level sonography programs within the state of Maryland. HCC's certification option will, therefore, not increase the overall number of sonographers within the region, as stated in Montgomery College's objection letter.

In its objection letter, Montgomery College provided EMSI Analytics for Talent Acquisition that stated there is no statistical data to support additional programs. However, the analytics were not specifically looking for the vascular technologist profession, which is the primary career option of HCC's proposed certificate. Rather, the analytics from EMSI show data for the entire DMS profession, which inaccurately reflect the current job market of vascular technologists within the area.

The job market for vascular technologists stands separate from other jobs in sonography. This becomes very clear when conducting a job search for positions in diagnostic medical sonography, as requests for vascular specialists are particularly noted. When originally determining the need for this certificate option, a search of several online job sites was conducted. Criteria were entered to narrow the search so results focused on ultrasound jobs either requiring vascular certification or preferring vascular certification in addition to other specialty certifications. In addition, searches were performed for vascular sonography jobs located in an area covering Maryland, West Virginia, the District of Columbia, and Virginia. Overall, more than 40 job postings were identified with full-time, part-time or PRN opportunities. The fact that almost half of these jobs stated a preference for multiple certifications, including vascular sonography, supports the need for existing sonographers to advance their knowledge, skill, and certification to include the vascular ultrasound specialty.

Another supporting survey was conducted on September 12, 2016, and is included as an attachment. The survey shows the current types of clinical practice, including general, vascular and cardiac ultrasound in major hospitals within the DC/Baltimore region. The majority (40 out of 53) had a combined ultrasound lab, including vascular practice, or were offering limited vascular service. This requires staff sonographers to be dually registered or have multiple credentials, including the vascular specialty. The fact that hospitals are combining ultrasound labs to include different specialties is becoming a new standard of ultrasound practice, and is requiring sonographers to be credentialed in more than two specialties, many include vascular ultrasound. HCC's proposed certificate option will provide working sonographers with a perfectly tailored education that leads to a vascular certification opportunity that will capitalize on this changing way of ultrasound practice. The supporting survey is attached, and is consistent with the number of openings in this field as referenced in the original proposal.

Impact on clinical student placement

The proposed vascular certificate option will not impact other existing sonography programs in the surrounding area in any negative manner. The proposed certificate option is for sonographers who are currently working in the field of ultrasound, and it is anticipated that a majority may complete their clinical training at their current place of business. Additionally, the limited clinical requirement, as well as lab and didactic work for these students is intended to take place on evenings and weekends. Therefore, students enrolled in the vascular certificate option would not need to be included in the numbers of students in the existing clinical site rotations.

In the objection letter, Montgomery College referenced an incident in which there was a placement issue during the summer. Students from HCC had attended the particular site each semester from the beginning of the program without negatively impacting placements at Montgomery College or any other DMS program.

HCC has always been respectful of other programs in the state when placements were sought. The staff and faculty of HCC's DMS program always verify that clinical affiliates and partners are prepared to accept clinical placements. Clinical partners are the determinants of the number of schools that they are prepared to host. When placing students, HCC has always collaborated with partners when other schools may have expressed interest in the site.

The HCC DMS program was implemented in 2013, and has been placing its students in clinical sites since 2014. HCC recognizes that clinical sites are not exclusive to any particular school, and believes that cooperation between schools and clinical sites is paramount to ensuring that all students achieve clinical goals.

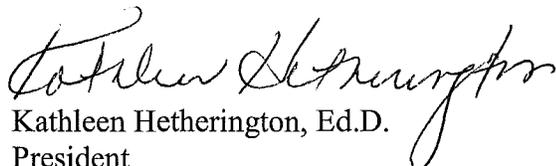
HCC has acquired sufficient clinical sites to support the existing program, as well as the certificate option without displacing students from other programs, including those of Montgomery College. From the time of its inception, the HCC DMS program did not learn of any student placement issues in 2014 and 2015. As with all clinical practice environments, there is nationwide attention on the clinical site availability. To this end, the newly proposed certificate program attempts to address the clinical site concern, as practicing sonographers will be expected to use current employment, when possible, to facilitate the clinical experience. Further, the majority of the clinical experiences will occur in the evenings and weekends.

Conclusion

In conclusion, HCC's proposed vascular ultrasound certificate option will benefit a targeted group of working professional sonographers to provide an opportunity for career expansion. This innovative and accelerated option is an ideal approach to meeting the needs of the health care arena for additional multi-specialty sonographers.

HCC has a history of collaboration with area colleges, and thoughtfully proposed this certificate option. It is believed that this option will enhance the diagnostic medical sonography profession, and will have little to no impact on Montgomery College or other sonography programs in the state. To that end, the faculty, staff, and administrators of the HCC diagnostic medical sonography program respectfully request approval of the newly proposed vascular certificate option.

Sincerely,



Kathleen Hetherington, Ed.D.
President

Attachment

**Greater DC/Baltimore Region
Hospital Vascular Practice Survey**

Hospital	Dedicated Gen. Lab	Gen. Lab /w Limited Vas.	Combined lab (Vas.+etc.)
Adventist Germantown			X
Baltimore VA Hospital	X		
Bon Secours Hospital			X
Children's National Medical Center	X		
Doctor's Community Hospital	X		
Frederick Memorial Hospital		X	
GBMC		X	
Hanover Hospital Center			X
Haymarket Medical Center			X
Holy Cross Hospital Germantown			X
Holy Cross Hospital Silver Spring			X
Howard County General Hospital		X	
INOVA Fair Oaks		X	
INOVA Fairfax		X	
INOVA Heart and Vascular Institute		X	
INOVA Lorton			X
INOVA Loudoun		X	
INOVA Mount Vernon			X
INOVA Springfield			X
INOVA Woodbridge			X
Johns Hopkins Bayview		X	
Johns Hopkins Hospital			X
Johns Hopkins Hospital Outpatient	X		
Kaiser Permanente Baltimore Harbor			X
Kaiser Permanente Camp Springs			X
Kaiser Permanente Kensington			X
Kaiser Permanente Largo			X
Kaiser Permanente Severna Park			X
Kaiser Permanente South Baltimore			X
Kaiser Permanente Woodlawn			X
Laurel Regional Hospital			X
Medstar Franklin Square			X
Medstar Georgetown			X
Medstar Good Samaritan	X		
Medstar Harbor			X
Medstar Union Memorial	X		
Mercy Medical Center		X	
Northwest Hospital	X		
Prince George's Hospital			X
Reston Hospital			X
Sentara North/Woodbridge		X	
Sinai Hospital			X
Southern Maryland Hospital			X
St. Agnes Hospital	X		
Suburban Hospital			X
UM Harford Memorial Hospital			X

Greater DC/Baltimore Region
Hospital Vascular Practice Survey

UM Upper Chesapeake Hospital			X
UMMC Main Campus		X	
UMMC Midtown Campus	X		
UMMC St. Joseph		X	
Washington Adventist Hospital	X		
Washington VA Hospital			X
Wellspan Gettysburg Hospital		X	

Vascular Ultrasound Job Postings
- September 12, 2016

Employer Name	Location	Exp. Req.	Cert. Req.
Accountable Allied Staffing	Alexandria, VA	None	RVT
Association of Alexandria Radiologists	Alexandria, VA	2yrs	RDMS, RVT
Aureus Medical Group	Washington, DC	None	RDMS, RVT
Aureus Medical Group	Richmond, VA	None	RDCS, RVT
Cardiac Vascular & Thoracic Surgery Associates	Falls Church, VA	2yrs	RVT
Concentric Methods	Manassas, VA	3yrs	RVT
Cornerstone RPO	Herndon, VA	None	RDCS, RVT
Dr. David Green	Bethesda, MD	None	RVT
Fairfax Radiological Consultants	Fairfax, VA	None	RVT
George Washington University	Rockville, MD	2yrs	RDMS, RVT
George Washingto Medical Faculty Associates	Washington, DC	2yrs	RVT
Healthcare Imaging	Baltimore, MD	2yrs	RDMS, RVT
INOVA Alexandria Hospital	Alexandria, VA	None	RDMS, RVT
INOVA Fairfax Hospital	Falls Church, VA	None	RDCS, RVT
INOVA Loudoun Hospital	Leesburg, VA	5yrs	RDCS, RVT
INOVA Mount Vernon Hospital	Alexandria, VA	5yrs	RDCS, RVT
INOVA Physician Group	Falls Church, VA	5yrs	RVT
Johns Hopkins Hospital	Baltimore, MD	None	RDMS, RVT
Laurel Regional Hospital	Laurel, MD	1yr	RDMS, RVT
Medstar Baltimore	Baltimore, MD	1yr	RDMS, RVT
Minimally Invasive Vascular Centers	Laurel, MD	2yrs	RVT
Northwest Hospital	Randalstown, MD	1-3yrs	RDMS, RVT
Presidential Healthcare Center	Washington, DC	2yrs	RDCS, RVT
Quadrant, Inc.	Fairfax, VA	1yr	RDMS, RVT
Radnet, Inc.	Bowie, MD	1yr	RDMS, RVT
Radnet, Inc.	Bethesda, MD	1yr	RDMS, RVT
Sibley Memorial Hospital	Washington, DC	None	RVT
St. Elizabeth Healthcare	Edgewood, MD	None	RDCS, RVT
The Center for Vein Restoration	Columbia, MD	None	RVT
The Center for Vein Restoration	Alexandria, VA	None	RVT
The Radiology Clinic	Rockville, MD	2yrs	RDMS, RVT
University of Maryland Medical Center	Baltimore, MD	1yr	RDMS, RVT
Vein Clinics of America	Columbia, MD	None	RVT
Vein Clinics of America	Pikesville, MD	None	RVT
Vein Clinics of America	Baltimore, MD	None	RVT
Vein Clinics of America	Annapolis, MD	None	RVT
Vein Clinics of America	Fairfax, VA	None	RVT
Vein Clinics of America	Tysons Corner, VA	None	RVT
Vein Clinics of America	Alexandria, VA	None	RVT
Vein Clinics of America	Sterling, VA	None	RVT
Washington Adventist Hospital	Takoma Park, MD	None	RDMS, RVT
Washington Hospital Center	Washington, DC	3-4yrs	RDMS, RVT