



NOTRE DAME
OF MARYLAND
UNIVERSITY

SCHOOL OF PHARMACY

Office of the Dean

June 26, 2015

Jennie C. Hunter-Cevera, Ph.D.
Acting Secretary of Higher Education
Maryland Higher Education Commission
6 N. Liberty Street 10th Floor
Baltimore, MD 21201

Dear Dr. Hunter-Cevera:

Notre Dame of Maryland University School of Pharmacy (NDMU-SOP) strongly recommends that the Maryland Higher Education Commission (MHEC) deny Lake Erie College of Medicine's (LECOM) application to operate in Maryland as an Out-of-State degree granting institution. NDMU-SOP's strong objection is based on Education Article § 11-206.1 of the Annotated Code of Maryland and the Code of Maryland Regulations 13B.02.03.27 in which an institution may object to an application if there is unreasonable program duplication which would cause demonstrable harm to another institution. The data and the basis for the objection are outlined below:

1. Place strain on existing resources in the state is unreasonably burdensome and may jeopardize our program accreditation.

As of Fall 2014, the three schools of pharmacy in Maryland enrolled 1,070 students (http://www.aacp.org/resources/research/institutionalresearch/Documents/2014_PPS_Enrollments.pdf). Both introductory and advanced clinical experiences account for one-third of our program as required by the Accreditation Standards 2007 (https://www.acpe-accredit.org/pdf/S2007Guidelines2.0_ChangesIdentifiedInRed.pdf). In addition, the standards set student-to-preceptor ratios of 3 to 1 for advanced experiences and 2 to 1 for introductory pharmacy practice experiences (<https://www.acpe-accredit.org/pdf/GuidanceforStandards2016FINAL.pdf>). The accreditation standards are also very specific as to the type of clinical facilities that can be used to meet the experiential education program requirements. Currently, the three schools are able to accommodate the number of students for the experiential education component of the program; however, this situation is dynamic, and there is little margin for increases in student numbers. In addition,

as a result of preceptor feedback, the three schools have agreed to common calendars and rotation start dates so that sites can accommodate the needs of just these three schools.

It should be noted LECOM enrolled 969 students in Fall 2014. The addition of students from LECOM will unduly stress the already competitive environment for quality experiential sites. To meet accreditation requirements, it is critically important that the three pre-existing schools of pharmacy in Maryland remain able to meet the demand for rotation placement sites. The strain that an additional school would place on the current resources may put ongoing accreditation at risk, a significant demonstrable harm.

2. **Data from Maryland Department of Labor, Maryland Occupational Projections 2012-2022 does not Support LECOM's Assertion of a Shortage of Pharmacists in Maryland**

In a letter to MHEC from Secretary of Maryland Department of Health and Mental Hygiene (DHMH) Van T. Mitchell, pharmacists were not identified as a shortage health profession. His letter was based on the Maryland Department of Labor, Maryland Occupational Projections 2012-2022

(http://www.mhec.state.md.us/grants/HealthShortageGrant/FY15/DHMH_Health_Occupations_Shortage_Letter.pdf) LECOM cited a shortage of 1,868 pharmacists by 2022, which is not correct as 1,312 of those are replacement positions. The difference of 556 positions is expected to be spread out over a period of 10 years resulting in only 5 to 6 new positions a year.

LECOM's claim of a pharmacist shortage in Maryland is further refuted by the Pharmacy Manpower Project (<http://pharmacymanpower.com>). The Pharmacy Manpower project estimates the demand for pharmacists in each state, and Maryland's demand has been lower than national demand for the last three years. In April 2015, the aggregate demand index for Maryland was 3.33 while it was 3.50 nationally (on a scale of 1-3, where 1 = high surplus, 5 = high demand).

3. **Inadequate Notice by LECOM**

MHEC requires OOS Initial Application to be submitted at least five months prior to proposed start date. Based on LECOM's 2014-2015 catalog (http://lecom.edu/content/uploads/2015/04/2014-15_Academic_Catalog_Jan2015.pdf), one can anticipate that the advanced practice experiences already started in early June 2015 for the Bradenton campus and will start in early August 2015 for the Lake Erie campus. This does not meet the five-month requirement. More importantly, as most schools plan for the experiential education program one year in advance, there is inadequate notice for NDMU-SOP to plan for any potential shortage in clinical placements.

We appreciate the opportunity to provide feedback on LECOM's application and would respectfully request denial of their application. Thank you for considering our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Anne Lin". The signature is fluid and cursive, with a prominent initial "A" and a long, sweeping underline.

Anne Lin, Pharm.D., FNAP
Dean & Professor