



September 15, 2015

Jennie C. Hunter-Cevera, Ph.D.  
Acting Secretary of Higher Education  
Maryland Higher Education Commission (MHEC)  
MHEC ([acadprop@mhec.state.md.us](mailto:acadprop@mhec.state.md.us))  
6 N. Liberty Street, 10<sup>th</sup> Floor  
Baltimore, MD 21201

**Re: Objection to the Sacred Heart University to offer the Master of Science (MSN) in Nursing Program and RN to Baccalaureate in Nursing (RN-BSN)**

Dear Dr. Hunter-Cervera:

Coppin State University (CSU) objects to the Sacred Heart University's proposal to offer the Master of Science (MSN) in Nursing Program and the RN to Baccalaureate in Nursing (RN-BSN) based on "unreasonable program duplication which would cause harm to another institution." Demonstrable harm would come from the **increased demand for qualified clinical preceptors and clinical sites.**

The following below summarizes our concerns that are consistent with Education Article § 11-206 of the Annotated Code of Maryland and the Code of Maryland Regulations 138.02.03.27 with regards to Sacred Heart University's proposal:

- **Unreasonable Program Duplication.** The program is duplicative in nature of a program at a Historical Black College and University (HBCU) and will cause demonstrable harm to our existing program as well as other programs offered in the region. The bulk of students (89%) recruited to Coppin are Maryland residents and 50% of our total student population are from the City of Baltimore.
- **Practicum and Clinical Sites.** While the proposed Sacred Heart program is anticipated to use an online delivery approach our demands for clinical sites continue to increase, not just for CSU but also for other institutions servicing the state of Maryland as these limited sites are shared in early clinical experiences components by multiple teacher preparation programs operating in the state of Maryland.

Core to CSU's mission is equitable access to higher education. CSU plays a central role in Maryland's response to the 2010 reports from both the American Association of Colleges of Nursing (AACN) and the Institute of Medicine (IOM) that more minority practitioners are needed to reduce health care disparities in this nation. The CSU College of Health Professions offers nursing programs in Baltimore for entry-level baccalaureate nurses, completion of the BSN degree

for current Registered Nurses, education courses for nurses who would become nurse educators, and the FNP and DNP Programs at the graduate level. The FNP graduate nursing program is accredited both by the Collegiate Commission on Nursing Education (CCNE) and the National League of Nursing Accrediting Commission (NLNAC).

CSU acknowledges that the current economic recession is thought to “mask” a looming nursing shortage, and that an improved economy and an increase in insured patients will likely lead to an increased demand for nurse practitioners. CSU also acknowledges that it has more interested applicants that it can accept for its FNP Program.

#### A Barrier to Program Expansion:

CSU is working hard to expand our nursing programs, and to make advanced degrees more accessible to nurses. **Locating clinical preceptors and sites for student experiences** has been the major **roadblock to our expansion**.

CSU’s FNP students must sometimes travel far to reach a suitable clinical site and preceptor. Current sites include not just the Baltimore area, but also locations such as Montgomery County, Annapolis, and Washington, D.C.

**Difficulty recruiting and retaining qualified nurse faculty and a shortage of clinical placement sites** are the two factors that have *limited the capacity of the CSU nursing programs to grow*.

#### A National Issue:

This is a national issue as well as a barrier for expanding our programs in Maryland. In 2010, AACN reported that nursing schools were unable to take all qualified applicants because of lack of faculty (61.4%) and an inadequate number of clinical teaching sites (60.8%).

#### A Conflict with State Efforts:

MHEC, the Maryland Health Services Cost Review Commission (HSCRC), the Maryland Hospital Association (MHA) and others have worked to **support the efforts of the nursing schools to maximize the use of clinical sites for nursing students in Maryland**. Demand for clinical sites is steadily increasing, not just from CSU but also other nursing schools in Baltimore and throughout Maryland. Clinical sites are shared by multiple nursing programs. They are already heavily utilized during non-traditional student hours, such as weekends and evenings. FNP preceptors are limited to Certified Nurse Practitioners and licensed physicians in the appropriate specialty who are serving the target patient population.

#### Non-traditional Strategies:

CSU has implemented non-traditional, evidence-based strategies to serve learners in the nursing program. CSU has a *model simulation laboratory* where students practice skills before they provide direct patient care and interact with an interdisciplinary health care team in one of our community settings. CSU has also developed expertise in the use of *asynchronous and synchronous instructional technology* to support educational objectives. In the end, however, nursing education requires qualified faculty preceptors and adequate clinical placements. **There are no shortcuts to assuring clinical competency and patient safety.**

Real and Present Harm to the Existing Program:

The requests from Marylanders to enter our nursing programs at CSU, especially our graduate FNP program, are growing. Every Sacred Heart University student who finds a preceptor in Maryland is taking a valuable preceptor from the limited pool available to our current students, and becomes another barrier to the expansion and even the success of our existing program. We appreciate your consideration of our serious objection to this proposal.

If Sacred Heart University is allowed to operate in the state of Maryland, it will hurt Coppin State University in retaining and increasing its enrollment level as well as hinder access to students planning to become professional educators within the state of Maryland. This is a national issue as well as a barrier for growth to Maryland's institutions of higher education. I appreciate your willingness to review our claim and support the notion that Sacred Heart's proposal is one of unreasonable duplication. More information may be provided upon request.

Sincerely,

A handwritten signature in blue ink that reads "Sadie R. Gregory". The signature is written in a cursive, flowing style.

Sadie R. Gregory, Ph.D.

Provost and Vice President for Academic Affairs

Cc: Dr. Marie Thompson, President  
Dr. Tracey L. Murray, Dean, College of Health Professions  
Mr. Michael Bowden, Assistant Vice President for Planning and Assessment