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March 24, 2020

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

Dear Secretary Fielder:

Please accept the following commentary from Frostburg State University on the proposal for a new PA Program in Maryland offered by Notre Dame of Maryland University.

As included in the proposal for a new PA Program at NDMU, healthcare programs are supported by a strong market need due to the “growing state and national physician shortage” particularly in rural and underserved areas. With this need in mind, Maryland will need to create an increased pipeline for healthcare providers particularly in this time of pandemic crisis. However, one of the reasons for the healthcare shortage is a decreasing supply of clinical education sites. The result of this limitation is a bottleneck of PA, medical, and nurse practitioner programs vying for the same clinical experiences in order to graduate competent healthcare practitioners. In addition to the concern for clinical education sites, Frostburg State University would like reassurance from NDMU that, similar to all other PA Programs in Maryland, they will not pay preceptors. The decrease in clinical education sites, coupled with one program offering financial incentives to preceptors, could jeopardize accreditation and viability for the other three programs.

In Maryland, there are currently three accredited PA Programs, Frostburg State University, Towson/CCBC, and University of Maryland Baltimore/AACC. As we discuss the development of the NDMU program, it is important to note that in Maryland’s contiguous surrounding states, there are currently thirty-five (35) accredited PA programs and nine (9) additional applicant programs.

- Pennsylvania - 22 Accredited – 7 Applicants
- West Virginia – 4 Accredited – 0 Applicants
- Virginia – 8 Accredited – 1 Applicant
- District of Columbia – 1 Accredited - 1 Applicant
- Delaware – 0 Accredited – 0 Applicants

In the report, “In the Growing Shortage of Clinical Training Sites Challenges Medical Schools” (Porter S. (2014). Just-released clerkship study: growing shortage of clinical training sites challenges medical schools. *Annals of family medicine*, 12(5), 484–486. <https://doi.org/10.1370/afm.1709>) the author states, “What has appeared to be solid progress toward growing an adequate U.S. health care workforce could be derailed by an escalating shortage of clinical training sites to accommodate many of those learners.” The report found that:

- Across all four disciplines (MD/DO/PA/NP), most respondents said finding clinical training sites for their students had become more difficult
- Most respondents said finding primary care training sites presented the greatest challenges
- More than half of respondents felt pressured to pay for training sites
- Many respondents had implemented nonmonetary incentives and alternative solutions to address training site shortages

Currently the PA Programs of Maryland use volunteer Clinical Preceptors. This is the standard agreed to among USM institutions to not pay clinical preceptors to avoid ever-increasing financial demands of medical education. When any program starts paying clinical preceptors, it will exclude other programs that do not or cannot pay to compete for those clinical sites. If the NDMU has any plans to pay clinical preceptors to develop their program, it would be devastating and threaten the existence of the other PA programs in Maryland.

Frostburg State University has a mission to educate PA students to provide healthcare in rural and medically underserved areas. As such, Frostburg State University does not oppose increasing the number of healthcare provider programs in the state per se but are concerned with worsening clinical site availability and the possibility of any program paying for clinical preceptors. As stated in their proposal, NDMU would utilize existing relationships from their pharmacy and nursing programs. These relationships with hospitals and long-term care facilities are not likely to be de novo rotation sites that other schools do not currently utilize. Also, as Maryland has been very cautious about raising the cost of clinical education for our students, we would like confirmation that NDMU does not have the intention of paying preceptors which has the potential of downstream financial harm to all USM students attending medical, PA, and nurse practitioner programs.

Therefore, our concerns lie in the potential for a further reduction in clinical training opportunities for students in the state along with significant increase in cost to PA/NP/MD students and their USM institutions should NDMU pay preceptors. If you have any questions, please do not hesitate to contact me or our Assistant VP for Analytics, Dr. Sara-Beth Bittinger at [sbittinger@frostburg.edu](mailto:sbittinger@frostburg.edu).

Yours truly,



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