

March 25, 2020

James D. Fielder, Jr., Ph.D.  
Secretary of Higher Education  
Maryland Higher Education Commission  
Division of Collegiate Affairs  
6 N. Liberty Street, 10<sup>th</sup> Floor  
Baltimore, MD 21201

RE: Opposition to NDMU Proposal to Offer Physician Assistant Education

Dear Secretary Fielder,

We have been informed by the Maryland Higher Education Commission (MHEC) that Notre Dame of Maryland University (NDMU) has applied for approval to develop a Physician Assistant (PA) program. While we understand NDMU's vision to extend its degree offerings to educate and train PAs, the University of Maryland Baltimore/Anne Arundel Community College Collaborative PA program is concerned about this proposal.

Our primary concern is over the critical shortage of clinical sites and preceptors. We utilize private and public hospital system-affiliated clinical sites and preceptors throughout Maryland and its Eastern Shore, Washington DC, parts of Virginia, Delaware and Pennsylvania to perform required clinical rotations. We are continually being turned away from long-standing clerkship sites and preceptors who are being mandated by their parent organizations to take medical students, nursing students, nurse practitioner students and medical residents, many from across the country and from the Caribbean. There is constant competition from every health profession for clinical sites and preceptors, adding to the growing burden of answering to PA accreditation standards mandated by the Accreditation Review Commission on Education for the Physician Assistant (ARC-PA).

Adding one more PA program in the state will only serve to increase the risk of non-compliance for our PA program, jeopardizing our viability. We are working diligently to not increase the tuition burden of our PA students by asking them to pay for clinical sites and preceptors. Passing tuition increases to all students is difficult, but even more so for the countless students who have an inability to pay based on their socio-economic statuses. Currently, physician assistant education suffers from a lack of diversity from underrepresented communities of color. We fear the additional burden on clinical sites by NDMU's entry into PA education will further compound this issue in the Maryland because of costs associated with retaining clinical rotation sites may require tuition increases.

In its proposal to MHEC, NDMU has stated it has relationships with 46 hospitals and three-long term care facilities through its School of Pharmacy program, and 22 hospitals through its partnerships with its School of Nursing. NDMU is relying on these relationships as well as their members on hospital boards to secure coveted clinical sites. There is no guarantee these sites will place PA students from NDMU as PA students train and practice under the medical model provided to medical students. Pharmacology and nursing students have different education and training requirements than do PA students. Additionally, we already have relationships with the health care institutions NDMU cites in its proposal. We view NDMU's proposal as a threat to our relationships with those institutions because they can only support so many physician assistant students on clinical rotations.

Our second concern is the demand for PAs in the state of Maryland. While we all understand the need to train and graduate PAs to join the state's healthcare workforce as soon as possible, the practicalities of providing solid clinical training with a enough patient encounters from across the lifespan is an extremely difficult task. The ARC-PA is one of the most stringent accrediting bodies in the nation. Waivers are not granted to offset clinical hours or course learning outcomes because of preceptor or site shortages. The issue once again becomes one of providing an adequate clinical year experience for all PA students in the state with the enormous shortage and competition for clinical sites.

We respectfully ask MHEC to reconsider NDMU's proposal to develop a PA program based on the above concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger J. Ward", with a large, stylized loop at the end.

Dr. Roger J. Ward, JD, MSL, MPA  
Interim Provost and Executive Vice President  
Dean, Graduate School