



University of Maryland Eastern Shore  
**Division of Academic Affairs**  
**Office of the Provost**  
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March 18, 2020

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

Dear Secretary Fielder:

The University of Maryland Eastern Shore has reviewed the proposal by Notre Dame of Maryland University (NDMU) to establish a Master of Science in Physician Assistant program. The University objects to the new proposal on the basis of unreasonable program duplication, which would cause demonstrable harm to another institution (COMAR 13b.02.03.09). The following narrative more specifically addresses our opposition to approval of this program proposal.

### **Existing Physician Assistant Programs in the Same Geographic Location**

The University System of Maryland (USM) currently has three Physician Assistant (PA) programs (Frostburg State University, Towson University/Community College of Baltimore County, and University of Maryland, Baltimore/Ane Arundel Community College) and one program (University of Maryland Eastern Shore) pending approval by the Accreditation Review Commission of Education for the Physician Assistant (ARC-PA). Two of the existing PA programs are located within 20 minutes of NDMU. The remaining programs are located on the Western and Eastern Shore of the state. Per the ARC-PA, all PA program curricula must adhere to the same standards. Therefore, NDMU's proposed program does not offer any unique advantages over the existing programs in the state.

### **Clinical Clerkships/Clinical Rotations**

Clinical rotations are a significant component of PA program curricula. The ARC-PA requires all students to complete eight rotations. There is already a dearth of rotation sites in the state of Maryland and the existing programs have noted the presence of out-of-state programs seeking clinical rotation opportunities in Maryland for its students. This has led to fewer rotation opportunities in Maryland for students enrolled in the existing USM programs. The entry of another program into the marketplace would only exacerbate this reality and make it difficult to satisfy the accreditation requirements.

Also, according to the Physician Assistant Education Association, By the Numbers, Program Report 34, clinical site shortage among PA programs within the Southern Region (which includes Maryland) has led to 44.3% of programs now paying for clinical rotations.<sup>1</sup> Currently, the programs within the USM do not pay for rotations. If this model was adopted, it would place



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an unnecessary financial strain on the existing programs. It is also unsustainable and would place the existing programs at a disadvantage compared to those with more financial resources.

1. <https://paeaonline.org/wp-content/uploads/2019/10/program-report-34-20191002.pdf>

In summary, the University of Maryland Eastern Shore objects to the establishment of the Master of Science in Physician Assistant program at Notre Dame of Maryland University. We believe the evidence presented in this communication clearly demonstrates that the proposal is an unnecessary duplication of programs and could cause demonstrable harm to the existing programs in the state.

Best regards,

A handwritten signature in black ink, appearing to read "N. Niemi".

Nancy S. Niemi, Ph.D.  
Provost & Vice President *for* Academic Affairs