WASHINGTON
ADVENTIST UNIVERSITY
OFFICE OF THE PRESIDENT

July 14, 2016

Dr. James D. Fielder, Jr.
Secretary of Higher Education
Maryland Higher Education Commission
6 North Liberty Street, 10th Floor
Baltimore, Maryland 21201

Dear Dr. Fielder:

Thank you for the opportunity to respond to the objection letter submitted by Salisbury University (SU) regarding Washington Adventist University's (WAU) proposal for a substantive change to the Bachelor of Science in Respiratory Care (BSRC) program. WAU has requested this change to bring the program into alignment with the "Standards of Accreditation of Degree Advancement Programs in Respiratory Care" adopted by the Commission on Accreditation for Respiratory Care (CoARC) in 2015. Our program proposal was submitted to the Maryland Higher Education Commission (MHEC) on February 23, 2016 with a projected implementation date of August 1, 2016.

Located in Takoma Park and enrolling approximately 1,050 undergraduate and graduate students, WAU is "... a learning community committed to the Seventh-day Adventist Christian vision of excellence and service. The cosmopolitan institution challenges students to seize the opportunities for learning in the nation's capital in order to become moral leaders in communities throughout the world." WAU's 100+ year heritage of faith-infused learning offers students a unique set of educational perspectives. Our institution currently offers multiple programs in the health sciences including respiratory care, health care administration, medical laboratory science, and nursing. This requested modification to the BSRC program is fully in line with our mission, strategic goals, and current academic program offerings.

Our response will address and provide clarification for three primary areas of concern raised by SU: (1) program comparisons between WAU and SU; (2) market demand for respiratory care practitioners; and (3) educational need and program alternatives in Maryland. In addition, our response will demonstrate the WAU program is not geographically proximate to the SU program.

Program Comparisons between WAU and SU

While both WAU and SU offer the BSRC degree, these programs differ substantially in content, curriculum, areas of focus, and intended student audiences. While the SU BSRC is designed for students without respiratory care knowledge or skills (i.e., an entry-level program), the WAU BSRC is designed for students already working as registered respiratory therapists (RRT) (i.e., a degree advancement program). Further, SU's program is accredited by CoARC as an entry-level program, defined as follows: "To prepare graduates with demonstrated competence in the cognitive (knowledge), psychomotor (skills), and affective (behavior) learning domains of respiratory care practice as performed by registered respiratory therapists." (See Entry-Level CoARC Standards: http://www.coarc.com/29.html.) In contrast, WAU's program is designed to meet CoARC's degree advancement standards, defined as follows: "To provide graduates of entry into respiratory care professional practice degree programs with additional knowledge, skills, and attributes in leadership, management, education, research, or advanced clinical practice both to meet their current professional goals and to prepare them for practice as advanced degree respiratory therapists." (See Degree Advancement CoARC Standards: http://www.coarc.com/74.html.)

While both WAU's and SU's BSRC programs include courses in respiratory care research and management, the programs differ substantially in other content. SU's program requires five science courses, three clinical practicums, a critical care specialization, and a diagnostics specialization, while the proposed WAU BSRC does not require either science or clinical requirements but includes respiratory care education and leadership courses. This is because WAU's program has been designed to admit students at the junior level who have already gained certain competencies, as documented by their prior graduation from an accredited entry-level program and by their RRT credential from the National Board for Respiratory Care. As defined by the 2015 degree advancement standards, WAU's BSRC program will provide these students with critical knowledge, skills, and competencies in research, management, education, and leadership, both to meet their current professional goals and to prepare them for practice as advanced degree respiratory therapists.

Market Demand for Respiratory Care Practitioners

The American Association for Respiratory Care (AARC) has established a goal that by 2020, 80% of the respiratory care workforce shall be in possession of, or in pursuit of, a bachelor's degree. This attainment goal includes both the current respiratory care workforce and new associate's degree entry-level graduates in future years. In WAU's BSRC program proposal to MHEC, the calculations that were presented were based on AARC national data showing that 65% of the respiratory care workforce in 2014 already possessed, or was in pursuit of, a bachelor's degree. Our calculations correctly took into account that an estimated 65% of the RRT workforce currently holds a bachelor's degree, and that adding a marginal 15% to reach the goal of 80% among Maryland's current 2,343 RRT practitioners would mean an additional 351 bachelor's degrees. We acknowledge that is likely a low-end estimate, as it does not factor in retirements, replacements, and projected growth in this sector.

In its objection letter, SU countered that for the State of Maryland, only 40% of the respiratory care workforce held a bachelor's degree in 2014. We were not able to confirm the data referenced by SU. However, even if we were to assume that SU's 40% figure was correct, SU's calculations were not. If 40% of the current Maryland workforce held a bachelor's degree in 2014, than getting to the AARC goal of 80% by 2020 would require an increase of 40% (40% + 40% = 80%), not the 15% figure based on the national data provided by AARC (65% + 15% = 80%). Thus, another 40% of the 2,343 RRT practitioners in Maryland, or 937 students, would need to pursue or obtain a bachelor's degree by 2020 to meet the AARC goal. This figure far exceeds SU's calculation of an additional 209 students.

According to occupational projections reported by the Maryland Department of Labor, Licensing and Regulation (DLLR), there will be an anticipated 15% growth in the number of new job openings for respiratory therapists in Maryland between 2012 and 2022. Based on these data and the calculations presented above, WAU disagrees with SU's statement that there is a limited pool of students for the BSRC program and that existing bachelor's degree programs in the State are already adequately serving these students. In fact, while SU's BSRC program has had steady student enrollments over the past several years, in 2015 it only produced 37 graduates. Over the past five years, the average annual number of graduates from SU's program has only been 33 students. SU simply cannot meet current or future statewide needs in this field with a single degree program. WAU stands ready to provide RRT practitioners in Maryland with another high quality and accessible option for the BSRC degree.

Educational Need and Program Alternatives in Maryland

Of significance is that WAU currently offers an associate's degree in respiratory care and has an established pipeline of WAU students and alumni in the field who could immediately benefit from the bachelor's degree program. In addition to our own graduates, WAU's program can directly meet the needs of Maryland community college graduates. According to the CoARC *2015 Report on Accreditation*, Maryland's six respiratory care/therapy associate's degree programs produced 90 entry-level graduates in 2014. If AARC's attainment goal of 80% is to be met, then 80% of these 90 associate's degree graduates, or 72 graduates per year, should be pursuing a bachelor's degree. In this same CoARC report, SU's maximum enrollment capacity for respiratory care/therapy was reported at 40 newly admitted students per year. Even if all 40 of these annual BSRC slots went to Maryland associate's degree graduates in respiratory care/therapy, there would still be excess associate's degree graduates who would need to enroll in a bachelor's degree program.

WAU acknowledges SU's point that the AARC "80% by 2020" goal does not provide guidance on what type of bachelor's degree should be attained by associate's degree prepared RRTs. That being said, the AARC's "Support for Transitioning from Associate to Baccalaureate Degrees in Respiratory Therapy" clearly outlines the rationale for the AARC drive to increase the academic preparation of the workforce. Further, CoARC has stated: "Degree Advancement programs are designed specifically to meet the needs of practicing respiratory therapists with an RRT who, having already completed an accredited respiratory care program with an entry into respiratory care professional practice degree, wish to obtain advanced training in respiratory care (e.g., Associate to Baccalaureate or Baccalaureate to Masters)." WAU strongly believes that the intent of the AARC drive to increase the academic

preparation of the respiratory care workforce would be best served by bachelor's degree programs that align with the CoARC Degree Advancement standards.

Along these lines, SU's objection letter contends that WAU's proposed program would duplicate Towson University's (TU) Bachelor of Science in Health Sciences, since RRT graduates could technically complete any bachelor's degree toward the "80% by 2020" goal. An analysis of TU's curriculum reveals that the primary emphasis of its Bachelor of Science in Health Sciences program is in school health and community health. Like TU, many Maryland colleges and universities offer generalist health sciences degrees at the bachelor's level. However, these degrees are not specifically designed to serve as professional advancement degrees in respiratory care, nor are they aligned with CoARC's accreditation standards. Further, we wish to note that TU itself did not file an objection to WAU's BSRC program.

Geographic Proximity

In comparing the WAU and SU programs, it is also important to note the basic fact that they are not at all geographically proximate and will not serve the same communities, with campuses located approximately 120 miles apart. WAU is well positioned to meet immediate workforce and education needs in Montgomery County, Prince George's County, and the D.C. Metro Area, and has already established respiratory care partnerships with as evidenced by the diverse members of its Advisory Board which includes the Director of Prince Georges Community College Respiratory Program, the Medical Director of Adventist Health Care, the Respiratory Care Program Director of Dimensions Health Care Systems and the Director for Respiratory Care Prince Georges Hospital Center. WAU intends to offer a hybrid and/or online version of the BSRC program in addition to the campus-based program, whereas SU only offers the program in a traditional format. In June 2016 WAU applied to become a participating institution in the State Authorization Reciprocity Agreement (SARA), and intends to accept distance education students from other SARA states, in addition to Maryland students.

In summary, WAU maintains that the proposed BSRC, as a post-professional degree advancement program designed to meet the newly adopted CoARC standards, substantially differs from SU's existing entry-level BSRC program. Further, the state-level market demand data for Maryland suggest that the need for additional bachelor's degrees in this field far exceeds the capacity of a single higher education institution. There is no evidence that WAU's modified BSRC program, as currently proposed, would cause any demonstrable harm to SU's existing program. Furthermore, this program would respond to the global system of Seventh Day Adventist faith based health care delivery.

Again, thank you for the opportunity to address the points raised in SU's objection letter. Please do not hesitate to contact me if I can provide additional information to MHEC in support of our BSRC program.

Sincerely,

Dr. Weymouth Spence
President

cc: Ms. Tina Bjarekull, President, MICUA
Ms. Monica Wheatley, Associate Director of Academic Affairs, MHEC