

June 17, 2016

Dr. James Fielder
Director of Academic Affairs
Maryland Higher Education Commission
839 Bestgate Rd.
Annapolis, MD 21401

Dear Dr. Fielder,

Salisbury University objects to the proposal by the Washington Adventist University to offer a Bachelor of Science (B.S.) in Respiratory Care. As noted under Education Article § 11-206 of the Annotated Code of Maryland and the Code of Maryland Regulations 13B.02.03.25, area #3, we believe this program will result in unreasonable program duplication, which would cause demonstrable harm to another institution. We express this concern as it relates to inaccuracies regarding the anticipated student market on page 19 and 20 of the proposal.

The WAU proposal correctly states that the American Association for Respiratory Care (AARC) Board of Directors have set a goal that 80% of the respiratory care workforce should have a BS degree or be in pursuit of a BS degree by 2020 (<https://www.aarc.org/aarc-bod-sets-80-bachelor-degree-goal-by-2020/>). The most current data available, the AARC 2014 Human Resource Study, states that 65% of the current respiratory therapist workforce has a BS degree or is in pursuit of a BS degree. This means the goal of the AARC Board of Directors is to raise the number of working respiratory therapists who have or are seeking a BS degree by 15% (i.e., 65% to 80% of the workforce). The WAU proposal uses the AARC Board of Directors goal as a basis for their enrollment projections. Using data from the AARC 2014 Human Resource Study, there are approximately 2343 practicing registered respiratory therapists (RRT) currently in the state of Maryland. The WAU proposal asserts that 15% of the 2343 RRTs must enroll in BS programs to meet the AARC Board of Directors goals. As proposed this would translate to 351 Maryland RRTs as prospective students for the WAU program.

This logic is flawed for the following reasons:

1. The AARC Board of Directors does not provide guidance on what type of BS degree should be attained by associate degree-prepared RRTs. As such any BS degree would fulfill this requirement.
 - a. The proposal correctly states that Salisbury University has an advanced standing policy within the Respiratory Therapy degree that targets the same potential students as the WAU proposal.
 - b. Towson University also currently offers a BS degree in Health Sciences that targets the same potential students as the WAU proposal.

2. The WAU proposal assumes that all RRTs practicing in the state of Maryland have an associate degree. This assumption is not correct. The AARC Human Resource survey projects that 40% of the current respiratory therapist workforce has a BS degree. Out of the approximately 2343 practicing RRT's, the AARC Human Resource Study projects that 1393 do not have a BS degree. This would result in a potential student pool of 209 students, not 351 as the WAU proposal claims. This represents a 40% reduction in the student pool as currently claimed in the WAU proposal. Additionally, to fulfill the AARC goal, these students also have the option of any BS program of their preference (e.g., Salisbury University, Towson, or any other institution of higher education that accepts graduates of associate degree colleges).

The projected 209 students available for program enrolment across the state of Maryland represents a limited pool of students for the programs that currently exist, programs that already adequately serve this population. Salisbury University objects to the proposal by Washington Adventists University to offer a Bachelor's of Science in Respiratory Care as it would result in a diminished pool of students for the programs currently available in the state causing them demonstrable harm. We hope that you take this new information into consideration when evaluating the solvency of all programs that would be affected by this proposal.

Sincerely,



Diane D. Allen, Ed.D.
Provost and Senior Vice President
for Academic Affairs

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cc: file
T. Hollander