



## Lake Erie College of Osteopathic Medicine

Office of the President *John M. Ferretti, D.O.*

July 8, 2015

Jennie C. Hunter-Cevera, Ph.D.  
Acting Secretary of Higher Education  
Maryland Higher Education Commission  
6 N. Liberty Street, 10<sup>th</sup> Floor  
Baltimore, MD 21201  
Sent via email to acadprop.mhec@maryland.gov

**RE:** Response to Objections of the Notre Dame of Maryland University School of Pharmacy

Dear Dr. Hunter-Cevera, Chairperson Hasan, and Members of the Commission:

Thank you for forwarding to me the letter of objection to you of June 26, 2015 by Dr. Anne Lin of the Notre Dame of Maryland University School of Pharmacy (NDMU-SOP). Thank you also for providing me with this opportunity to supply the Commission with my comments and reactions.

I note the objections raised by NDMU-SOP are extremely similar, if not identical, to those previously raised by the University of Maryland School of Pharmacy (UMSOP), even down to repetition of the same arithmetic error (i.e. dividing the projected number of newly-created pharmacist jobs in Maryland during a 10-year period by 100 in order to calculate the annual average). Accordingly, while I do respond briefly below to each of the NDMU-SOP objections, I refer you to my more complete and detailed response of June 26, 2015 to the letter of objection by UMSOP.

As a preliminary matter, I note that NDMU-SOP bases its objections on "unreasonable program duplication." As explained in my letter to you of June 26, 2015, there is no duplication between the two LECOM School of Pharmacy programs for which LECOM seeks authorization to operate in Maryland with any programs offered by any Maryland institutions.

1. LECOM is accredited to offer the Pharm.D. via distance education as the first professional degree. The program is accredited for up to 24 students per year, nationwide, and we anticipate no more than 3 to 5 students per year would ever be in Maryland. **We are one of only two such programs in the nation, the other of which is Creighton University in Nebraska. No distance education program for the first professional degree in pharmacy is offered by any Maryland institution; not NDMU-SOP, not UMSOP, and not University of Maryland Eastern Shore School of Pharmacy.** Thus, if a Maryland resident wishes to become a pharmacist via study from home on a

distance education basis, only LECOM's program and another out-of-state program are available.

2. The Pharm.D. program at LECOM Erie is an accelerated program during which students study on a year-round basis for three years, rather than during the academic year only for four years. **We are one of only twelve accredited three-year programs, none of which are at Maryland institutions; not at NDMU-SOP, not at UMSOP, and not at the University of Maryland Eastern Shore School of Pharmacy.** Thus, if a Maryland resident wishes to earn the Pharm.D. in three years and to enter the workforce a year earlier, that student must leave Maryland for, at least, the campus-based portion of the program. We would like to provide Maryland residents enrolled in this program with the opportunity of returning home for their experiential rotations, if they wish to do so. During 2014-2015, there were a total of 28 Maryland residents enrolled across all three years of the program. Aside from re-capturing the "opportunity costs" lost by students in four-year programs, the accelerated program offers a substantial cost saving to Maryland residents due to the one fewer year of tuition.

Institution	Annual Tuition 2015-2016	Tuition x Program Length	Comparison to LECOM
UMSOP	\$21,761 (in-state)	\$87,044	\$10,574 more; 13.8%
UM-Eastern Shore	\$27,066 (in-state)	\$108,264	\$31,794 more; 41.6%
NDMU-SOP	\$37,048	\$148,192	\$71,722 more; 93.8%
LECOM Erie SOP	\$25,490	\$76,470	---

#### NDMU-SOP Objection #1

NDMU-SOP cites the total enrollment of the LECOM School of Pharmacy (including LECOM Erie and LECOM Bradenton) during Fall 2014 of 969, compares it to the comparable enrollment of the three Maryland schools combined (1,070) and asserts that "the addition of students from LECOM will unduly stress the already competitive environment for quality experiential sites" and "the strain that an additional school would place on the current resources may put ongoing accreditation at risk."

As noted above, if approval to operate is granted, the LECOM SOP footprint in Maryland would be quite small; perhaps as many as 5 students per each year of the distance education program and approximately 10 students in each of the experiential components of the accelerated program. As noted in my letter to you of June 26, 2015 with respect to the similar objection by the UMSOP, the number of preceptors claimed by the UMSOP alone is more than sufficient to accommodate all of the students in all three Maryland schools with more than enough additional

capacity to accommodate many times these few LECOM students. That letter also details the substantial number of non-teaching pharmacists in Maryland, as yet untapped by any school.

For a more detailed response concerning this objection, please see my letter to you of June 26, 2015 (under the heading “UMSOP Objection #2).

#### NDMU-SOP Objection #2

NDMU-SOP asserts that “LECOM’s claim of a pharmacist shortage in Maryland” is “refuted” by the Pharmacy Manpower Project. NDMU-SOP notes that this Project estimates the demand for pharmacists in each state and that Maryland’s demand, at 3.33, is less than the national average of 3.50. As explained on the Project’s website ([www.pharmacymanpower.com](http://www.pharmacymanpower.com)) and in my letter to you of June 26, 2015, any Pharmacy Manpower Project score greater than 3.0 indicates a shortage of pharmacists in relation to the demand. Thus, while the shortage is less severe in Maryland than in the nation as a whole, Maryland’s demand for pharmacists does exceed the available supply, and LECOM’s identification of that shortage is in no way refuted.

NDMU-SOP also asserts that LECOM’s reference to the Department of Health and Mental Hygiene’s “Maryland Occupational Projection” of 1,868 pharmacist openings between 2012 and 2022 is “incorrect” as 1,312 of those are replacement positions. NDMU-SOP then repeats the mathematical error contained in the earlier letter by UMSOP and calculates that the remaining 556 new jobs during the 10 year period results in only 5 to 6 new jobs per year. It is not clear why NDMU-SOP, like UMSOP, believes that an “opening” created by retirement, death, or relocation should not count as an opening – both new positions and replacement positions need to be filled.

For a more detailed response concerning this objection, please see my letter to you of June 26, 2015 (under the heading “UMSOP Objection #1).

#### NDMU-SOP Objection #3

NDMU-SOP, like UMSOP, argues that LECOM’s application is untimely and provides “inadequate notice for NDMU-SOP to plan for any potential shortage in clinical placements.” As noted above, and as described in more detail in my letter to you of June 26, 2015, approval of LECOM’s application will not result in a shortage of clinical placements.

With respect to the application submission date, we believe the Commission now has all the information that is needed to approve the application and we encourage the Commission to do so expeditiously. If, however, there is a hard and fast five-month advance submission requirement, we note that the application was received on May 6, 2015 and we encourage the Commission to make its approval effective on October 6, 2015.

Thank you once again for the opportunity to respond, in this abbreviated form, to the objections submitted by the Notre Dame of Maryland University School of Pharmacy. For a more detailed and comprehensive response, please see my letter to you of June 26, 2015 which

was submitted in response to the same objections by the University of Maryland School of Pharmacy.

Sincerely,

A handwritten signature in black ink, appearing to read "John M. Ferretti". The signature is written in a cursive style with a large initial "J" and a stylized "F".

John M. Ferretti, D.O., FACOI  
President and Chief Executive Officer