



**Standard Healthcare Services, Inc.  
College of Nursing**

**October 13, 2017**

**Response to Maryland Higher Education Commission**

## Introduction

Please accept this statement from Standard Healthcare Services College of Nursing (“Standard College”) in response to your letter dated September 26, 2017. This response contains five parts: (1) the introduction, (2) the procedural history of Standard College’s application, (3) the facts of the case, (4) a discussion pertaining to COMAR 13B.02.03.09, COMAR 13B.02.03.08, as well as the comments raised by the letter writers, and (5) the conclusion.

Standard College’s objective in seeking authorization to operate at a clinical site in a Maryland hospital is to meet the educational needs of its Maryland students.

Over 40% of the students in the Standard College LPN to RN program reside in Maryland.<sup>1</sup> The Maryland students currently drive 1 ½ - 2½ hours one way in difficult DC/MD/VA traffic to attend a clinical practicum, a required part of the program, now located at a Virginia hospital. Standard College hopes to remedy the arduous commute of Maryland students by gaining permission to offer a clinical practicum in Maryland.

The clinical practicum in Maryland, if the application is approved, will accommodate eight-ten students at a time, and will run once a week for a total of 32 weeks during the year. The eight-ten students participating in the clinical practicum in Maryland will all be residents of Maryland. The Virginia students at Standard College will continue to attend the clinical site at a hospital located in Virginia.

## Procedural History

On November 4, 2016, Standard College submitted an application for initial approval with MHEC as an Out-of-State institution seeking permission to offer an experiential learning, clinical practicum, at a Maryland hospital, as a required part of the curriculum for students enrolled in its LPN to RN program.<sup>2</sup> On Nov. 10, 2016, MHEC requested four additional documents from Standard College in order to complete the application.<sup>3</sup> On Dec. 29, 2016, MHEC informed Standard College that the application was deemed complete. Institutions of higher education were subsequently informed of the proposal, and a period for comments was held. On March

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<sup>1</sup> Students live in numerous locations throughout Maryland, including Baltimore, Germantown, Owings Mills, Waldorf, Hyattsville, Gaithersburg, Bowie, Hyattsville, Clinton, Silver Spring, Lanham, Gwynn Oak, and Laurel.

<sup>2</sup> The proposed application would place eight-ten students at a time at one site in Maryland in a supervised practicum.

<sup>3</sup> On Nov. 10, 2016 MHEC informed Standard College that “the following is required in order to deem the application complete and begin the circulation process:

- Pg 4: New programs - Please list the information for the degree, not the practicum courses
- Pg 6: Comparison to existing programs in the state - this section is insufficient. You must compare the proposed program to similar programs offered in the State of Maryland and demonstrate that the proposed program is not substantially duplicative
- Please provide the *current* Certificate of Good Standing to operate in Maryland
- Please provide a copy of the degree(s) to be awarded.”

27, 2017, MHEC informed Standard College that “the proposal submitted by Standard has completed the 30-day circulation period without any comments or objections.” On the same day, MHEC informed Standard College that a required document, a memorandum of understanding, had not been included with the application and “a current signed and executed MOU is required in order to proceed with the authorization process.”<sup>4</sup> An MOU was not one of the documents cited in the November 2016 request. Standard College was instructed to submit a revised application, along with the written memorandum of understanding with a Maryland entity, which it did on April 28, 2017.<sup>5</sup> Again, MHEC accepted the application, institutions of higher education were informed of the proposal, and a now a second 30-day notice period was invoked. This time, eight community colleges, along with the Maryland Association of Associate Degree Nursing Programs, submitted comments, objecting to Standard College’s application.

### **Facts**

Standard College is a degree-granting, private nursing school, located in Falls Church, Virginia. Standard College is accredited by the Accrediting Bureau of Health Education Schools, certified to operate by the State Council of Higher Education in Virginia, and approved by the Virginia Board of Nursing. Standard College has been operating in good standing in the State of Virginia since 2004. Standard College offers two programs: an LPN to RN program and a Practical Nursing program. The diverse, multi-cultural student population is comprised of self-directed, motivated adult learners, represented by 87% African American students, 7% Asian students, 3 % Hispanics/Latino students, and 3% White/Caucasian students.<sup>6</sup> Standard College’s student body composition is comparable to the student race/ethnicity profile of Historically Black Colleges in Maryland.

Standard College’s LPN to RN program contains a clinical practicum requirement. Students are required to participate in a once per week, 12 hour shift, at a clinical site within a hospital setting for a sixteen-week period. Each is shift is held from 7:00 am – 7:00 pm. Currently, the students are participating in one of three possible clinical sites in Virginia: Sentara Hospital, located at 2300 Opitz Blvd, Woodbridge, VA 22191, Stone Spring Hospital, located at 24440 Stone Springs Blvd, Dulles, VA 20166, or Dominion Hospital, located at 2960 Sleepy Hollow Rd, Falls Church, VA 22044.

### **Discussion**

You have asked that particular attention be given to the Code of Maryland Regulations (COMAR) concerning criteria for approving proposed programs, especially unreasonable program duplication that would cause demonstrable harm to another institution, addressed in

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<sup>4</sup> On March 28, 2017, MHEC informed Standard College that “The MOU is required as a part of the application; we cannot proceed without it” and “a current signed and executed MOU is required in order to proceed with the authorization process.”

<sup>5</sup> Standard College signed an MOU with Doctor’s Hospital in July 2017 and with Heritage Care in April 2017.

<sup>6</sup> The National Center for Education Statistics,  
<https://nces.ed.gov/collegenavigator/?q=Standard+Healthcare+Services&s=all&id=483814#enrolmt>

COMAR 13B.02.03.09 and also compelling regional need and demand issues as outlined in COMAR 13B.02.03.08. You have also asked that Standard College respond to the comments raised in the letters of objection. We will proceed with a response to each of these issues.

### Duplication of the Proposed Program

According to the State of Maryland, evidence to substantiate whether Standard College is duplicative to similar nursing schools includes looking at existing programs in a specific geographically proximate location in the State.<sup>7</sup>

Here, this means identifying the nursing programs that are within geographic proximity to Doctor's Hospital and Heritage Care, the proposed clinical sites for Standard College students.

There are approximately 15 private and 1 public nursing school located within a 10 mile radius to the proposed clinical sites. None of these schools raised an objection or commented on Standard College's application during either of the two comment periods.

Although eight community colleges did comment on Standard College's application, Prince George's Community College (PGCC), the closest nursing school to the proposed clinical site, was not among these colleges who voiced an objection or comment. PGCC is located about 9 miles from Doctor's Hospital. PGCC did not comment or object to Standard College's application during either comment period.

The nursing schools that did comment to Standard College's application during the second comment period, Anne Arundel Community School, Allegany College of Maryland, Carroll Community College, Cecil College, College of Southern Maryland, Community Colleges of Baltimore County, Frederick Community College, Howard Community College are located 28, 144, 54, 72, 37, 24, 55, and 23 miles, respectively, to Doctor's Hospital. While MHEC understandably provides an opportunity for nursing educational institutions to respond to an out-of-state institution application, the impact of harm to a college 50 miles away or more from the clinical site at Doctor's Hospital is negligible. If, on the other hand, instead of eight, there were eighty or eight hundred students from Standard College, this could be a cause of concern. But with only eight to ten students from Standard College participating at the Maryland site once per week, the suggestion of harm is questionable. Furthermore, neither the community colleges nor MAADNP provided data to support their contention of possible harm.

Additional evidence the Commission considers when determining whether unreasonable duplication of existing programs is an "analysis of **enrollment characteristics**."<sup>8</sup> As noted

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<sup>7</sup> COMAR 13B.02.03.09 states that "Evidence demonstrating that a proposed program is not duplicative of similar offerings in the State shall be submitted by the institution. At a minimum, this evidence shall be substantiated on the basis that the proposed program to be offered is not unreasonably duplicative of existing programs in a specific geographically proximate location in the State."

<sup>8</sup> COMAR 13B02.03.09 C2(d) Determination of Duplication, Analysis of enrollment characteristics

earlier, the student body composition at Standard College consists of 87% of the student body identifying as Black/African. All eight community colleges have a substantially different student body composition to Standard College. They are far less diverse, and for this reason, provide a significantly different educational experience. Arguably, none of them are a duplicative program to Standard College on this basis alone. Based on the National Center for Educational Statistics, the percentage of Black/African students at the 8 objecting community colleges are:

Anne Arundel Community School	17%
Allegany College of Maryland	11%
Carroll Community College	4%
Cecil College	10%
College of Southern Maryland	26%
CCBC	38%
Frederick Community College	12%
Howard Community College	29%

Additional evidence the Commission considers when determining unreasonable duplication of existing programs is an analysis of the program’s **“admission requirements.”**<sup>9</sup> Students who are perceived as “less competitive” and are rejected by the programs in Maryland, but who have strong GPAs, may apply for admission to Standard College’s LPN to RN Associate degree program. The students from Maryland who get accepted into Standard College are then subsequently supported and empowered to flourish in the nursing program. They become successful students and professionals, as measured by traditional benchmarks. In the fall 2016 graduating LPN to RN class, 83% of the students graduated from the program and 50% of the students continued their education by enrolling in a BSN program. The retention rate for the 2015-2016 LPN to RN class is 93%. The five year average NCLEX rate is 89%.

### **Compelling Regional Need and Demand Issues**

The more expansive admission requirements at Standard College dovetail with the school’s interest in expanding educational opportunities and choices for minority and educationally disadvantaged students at institutions of higher education. The Maryland Code of Regulations state that a program proposal may demonstrate demand and need for the program in terms of meeting present and future needs of the region and the State in general by identifying “Societal needs, including expanding educational opportunities and choices for minority and educationally disadvantaged students at institutions of higher education.”<sup>10</sup>

Standard College’s admission criteria supports Maryland students who have not secured, cannot secure admission, or are admitted, but chose not to attend, the nursing programs in Maryland. Students who desire to work in the nursing profession, but are unable to be admitted in their home state, find the solution of a higher, relative short term cost of attending

<sup>9</sup> COMAR 13B02.03.09 C2(f) Determination of Duplication, Admission requirements

<sup>10</sup> COMAR 13B.02.03.08.08 B(2) Need for the Proposed Program

Standard College *cheaper* than waiting for some future, unspecified date when they might be admitted to the community colleges in Maryland. It is these students that Standard College supports. That said, a number of students at Standard College have been admitted into one of the Maryland community college nursing schools. The students choose not to attend the Maryland nursing school for a variety of reasons, including scheduling compatibility. Students have informed Standard College that classes at Maryland nursing schools are not held a time that fit their work or family schedule. For this reason, also, Standard College is not competing with the community colleges for its student pool.

As noted in the initial application, over 40% of the students at Standard College either live or work in Maryland, making Standard College a significant contributor to workforce and educational development in Maryland's health care system. This contribution assumes critical significance when it is put side by side with formal assessments about the well-documented nursing shortage not only in Maryland, but in the United States as a whole. According to the American Association of Colleges of Nursing, "The United States is projected to have a nursing shortage that is expected to intensify as baby boomers age and the need for health care grows. Compounding the problem is the fact that nursing colleges and university across the county are struggling to expand enrollment levels to meet the rising demand for nursing care."<sup>11</sup> In fact, according to the employment projections by the United States Bureau of Labor (2012), the number of employed nurses is projected to jump from 2.74 million in 2010 to 3.45 million in 2020, representing a 26% increase. If one factors in the number of nurses who will need to be replaced, the Bureau projects a combined total need of 1.2 million nurses by 2020, representing a 35% increase over the same time period.<sup>12</sup> Applying fairly sophisticated statistical techniques to comprehensive health care data covering the United States, Jarschek, Xiaoming, Vinoth, & Vernon (2012) provide compelling evidence for the need to produce more registered nurses (RNs) to alleviate the nursing shortage that is expected to worsen before it abates. Utilizing supply and demand models and univariate regression analyses, Juraschek et al forecast an RN shortage of nearly 13,000 for the state of Maryland in 2030. After applying a grading methodology to compare state shortage of RNs between 2009 and projected supply/demand curves for 2030 in all the 50 states of the United States, the authors concluded that Maryland will deteriorate from the grade C assigned in 2009 to a projected grade D in 2030.

The students at Standard College will help to alleviate this nursing shortage in Maryland. Although the Maryland students have chosen a Virginia school in which to study, they continue to live and work in Maryland. Upon graduating from the program, as nurses, they will positively impact the welfare of individuals, families, groups, and communities in Maryland by working in hospitals, clinics, acute care hospitals, long-term care facilities, health departments, school systems, and nursing homes throughout Maryland.

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<sup>11</sup> [www.aacn.nche.edu/media-relations/fact-sheet/nursing-shortage](http://www.aacn.nche.edu/media-relations/fact-sheet/nursing-shortage)

<sup>12</sup> [www.bls.gov/new.release/ecopro.t06.htmor](http://www.bls.gov/new.release/ecopro.t06.htmor)

## Comments Raised by Letter Writers<sup>13</sup>

A common comment raised by the letter writers is the availability of clinical education sites for nursing schools. Dramatic rhetoric is used to describe the possibility that “limited clinical availability inhibits nursing programs from accepting more students,” and could “potentially lead to decreased enrollments... creating harm to the enrollment of existing two-year and four-year educational institutions across the state.”<sup>14</sup>

Statements suggesting that Maryland nursing programs will be harmed on the basis of Standard College participating at a Maryland clinical site once per week belies the strength of the community colleges in Maryland. Thousands of student’s matriculate and graduate year after year in the well-established, well-structured community colleges of Maryland, accredited by ACEN, supported by MAADNP, and approved to operate by MHEC.

Furthermore, no data has been presented by any of the colleges or MAADNP demonstrating decreased enrollment as a result of clinical placements either in the past or now. Nor has any data been provided demonstrating how an out-of-state nursing schools has harmed a community college in Maryland through the clinical site placements. The colleges also do not state personal, direct harm as a result of an out-of-state school operating a clinical site in a nearby or distant hospital location. The comments made by the letter writers, suggesting possible harm, are hypothetical, unsupported by documentation.

We assume that the comments raised by the community colleges and MAADNP concerning the clinical sites are done so in the interest of protecting Maryland nursing students, not just in the interest of protecting their nursing school.

If Standard College’s application is approved, it is Maryland students who will benefit from the arrangement. Only students who live in Maryland would be placed at one of the Maryland clinical sites. Out-of-state students would continue to use the Virginia clinical site placement.

Many of these same Maryland students, who Standard College is now trying to help by gaining access to a Maryland site, applied to a number of the community colleges now commenting on the application. For various reasons, the Maryland students were either rejected from these colleges or choose not to attend. Instead, they choose Standard College for their nursing education. We assume that the letter writer’s would agree that there’s no harm in providing Maryland students with additional choices so that they may continue their education at a school that best meets their family needs and work schedules. “Community colleges remain committed to meeting the needs of our communities responsibility and proactively,” is a

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<sup>13</sup> MHEC’s August 24, 2017 MEMORANDUM states “Comments or objections shall be accompanied by detailed information supporting the reasons for the comment or objections. Undocumented submission will be considered as comments only.” Because the submissions by the community colleges were not documented, Standard College is using the word “comments” and not “objections” in reference to the letter writers.

<sup>14</sup> Dr. Tony Hawkins from Frederick Community College

conclusion shared by many of the letter writers. This information is based on surveys conducted at Standard College from October 7-8, 2017 from 35 Maryland students in the LPN to RN program. Please see attached summary of surveys.

Another issue raised by a number of the letter writers concerned the lack of a BSN degree program at Standard College, and presented this as one comment to Standard Healthcare Services application. For instance, Dr. Nancy Perry, MAADND states: “The Associate of Applied Science (offered by Standard Healthcare Services) is considered a terminal degree and typically does not contain the courses that assist in seamless transition to bachelor degree programs.”

To the contrary, Standard College’s LPN to RN program does provide a seamless transition for students wishing to continue their education. 50% of the students continue studying by transferring to a BSN program after graduating from Standard College. The students have no difficulty transferring their credits and degree to four year undergraduate programs. Students are provided with a strong academic foundation at Standard Healthcare Services to handle the course work at the undergraduate level. In fact, a member from the first cohort of Standard College’s graduates is currently enrolled in a DNP program at Touro University in Nevada, and is now working as a lead consultant for the Centers for Medicare and Medicaid Services.

Tuition at Standard Healthcare Services was also presented as an issue of concern with the letter writers. Again, contrary to all of their comments, the tuition at Standard Healthcare Services is \$429 per credit. It is not \$500 to \$700 per credit, as each of the letter writer’s erroneously state in their letter to MHEC.<sup>15</sup> The \$429 tuition charge per credit has been relatively stable for the past three years, in spite of rising costs and inflationary trends in the U.S. Standard College is acutely aware of the clarion call for containment of health care costs in the U.S., including the cost of nursing education. In pursuit of this desired cost containment goal, Standard College does not charge extra tuition for its out-of-state students. In fact, Standard College’s uniform tuition cost per credit of \$429 is not drastically different from the average of almost \$370 per credit charged by Maryland’s Associate degree programs for out-of-state students.

One comment from Anne Arundel Community School (AACS) concerned the development of a new Health Sciences building to be completed in 2021. Here Standard College politely notes that the initial approval process is granted for a period of 1 year.<sup>16</sup> Accordingly, the future concerns AACS raises are premature. The AACS program can be handled appropriately by MHEC at the correct time. Furthermore, AACS does not provide any data projecting a shortage of clinical sites either now or in the future for their students.

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<sup>15</sup> Standard College’s tuition is public information and easily accessible. It can be found at <http://www.standardcollege.edu/lpn-rn-transition-program-tuition/>

<sup>16</sup> 13B.02.01.07 .07 Institutional Initial Approval Process. B. The Secretary's approval to operate in Maryland, if granted, shall be for a period of 1 year and may be renewable on an annual basis for the first 5 years of operation in Maryland, and thereafter for an extended period of time up to 5 years.



AACS's undocumented submission, along with the other seven community college letter writers and MAADNP, should be considered as comments only. According to the August 24, 2017 MHEC memorandum in which MHEC requested written reactions to Standard Healthcare Services proposal, "Comments or objections shall be accompanied by detailed information supporting the reasons for the comment or objection. Undocumented submissions will be considered as comments only."

### **Conclusion**

The objective in seeking authorization to operate at a clinical site in a Maryland hospital is to better meet the educational needs of its Maryland students. The long commute Maryland students are now undertaking to the clinical practicum sites in Virginia needs to be alleviated. Maryland students, who may gain the opportunity to participate at the Doctors Hospital clinical site, if the application is approved, will contribute significantly to the state of Maryland upon graduating from the program. The students will continue to live and work in Maryland, and will contribute significantly to the overall health care delivery system in Maryland. As taxpayers, the students will also contribute to the overall economic growth of Maryland. Standard College is committed to providing quality education to students from Maryland enrolled in LPN to RN program, and will continue to support them to realize their individual goals of becoming registered nurses.

We respectfully now raise two questions in this conclusion.

First, the school wonders whether MHEC can require an out-of-state institution to supply a memorandum of understanding at any point in time, for any reason, even if it means restarting the entire application process. During the application process, Standard College was instructed to submit a revised application, which triggered a second comment period, because a memorandum of understanding (MOU) had not been supplied to the application. Standard College has recently been informed from MHEC that the MOU was "requested to ensure compliance with COMAR 13B.02.01.01B(4) and COMAR 13B.02.01.19." Each of these COMAR regulations concerns Facilities. Neither of these COMAR regulations, however, state any requirement for an MOU.

An MOU is addressed in the OOS Initial Application in only two contexts: a closed-site and the MRHE Center. The Facilities section in the Application is silent with regards to an MOU. The Facilities part of the Application, however, does request a certificate of compliance, but again, not an MOU. Accordingly, we find it surprising that Standard College was instructed to revise and restart the entire application process on the basis of providing a document that isn't explicitly required in the Application or the COMAR regulations.

Secondly, Standard College also questions whether a misunderstanding occurred with regard to the type of proposed program the school is seeking permission to operate. Standard College is not seeking to offer a postsecondary educational LPN to RN nursing program. Rather, Standard

College is seeking authorization to offer an experiential learning, clinical practicum, at a Maryland hospital, as a required part of the curriculum for students enrolled in its LPN to RN program. This is consistent with the statement in MHEC's August 24, 2017 memorandum, in which it requested written reactions to Standard's application, "Standard Healthcare Services has submitted an initial application to operate as an Out-of-State institution under 13B.0201 of the Code of Maryland Regulations until August 31, 2018, to offer the following program with experiential learning components (e.g., practica, internships) as a required part of the curriculum, thus constituting physical presence in Maryland." We mention this issue because it appears that some of the community colleges and MAADNP may have the impression that Standard College is seeking more than a once per week, clinical practicum for 8-10 Maryland students to operate in Maryland.<sup>17</sup>

In light of the fact that the application is only for a supervised clinical practicum at a hospital site in Maryland in which eight to ten students would be placed, we are respectfully inquiring now whether the school submitted the correct application initially.

According to COMAR 13B.02.01.04-1 Report of Out-of-State Institutions:

"An out-of-state institution that has ten or fewer students in a single program, placed simultaneously at one site in the State in a supervised internship, practicum, or field experience as a required part of a degree or certificate program shall:

- (1) Submit to the Secretary, by June 30 of each year, an [annual report](#) detailing the number of students placed at internship, practicum, or field experience location; and
- (2) [Register any online programs](#) in accordance with Education Article, §11-202.2, Annotated Code of Maryland."

Does this mean that Standard College is also required to submit an annual report, along with MHEC's OOS Initial Application? Or would submitting an annual report alone be sufficient in this particular case?

Standard College appreciates and respects your advice and guidance in this matter.

Standard College wishes to not only support the Maryland students in the program, but to honor and fully comply with the State of Maryland regulations.

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<sup>17</sup> For instance, Eileen Abel, College of Southern Maryland, states "Please accept this letter in response to the application submitted by Standard Healthcare Services to operate as an Out-of-State institution for an Associate of Applied Science (A.A.S) in Nursing (LPN to RN).

# **Attachment A**

**October 7 -8, 2017**

**Standard College**

**LPN to RN Survey**

**35 Maryland Students**

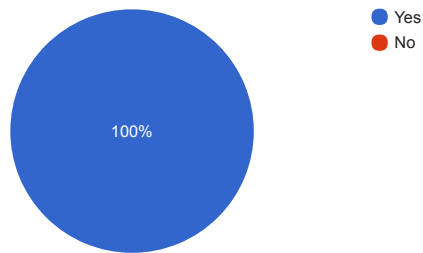


# LPN to RN Program Survey

35 responses

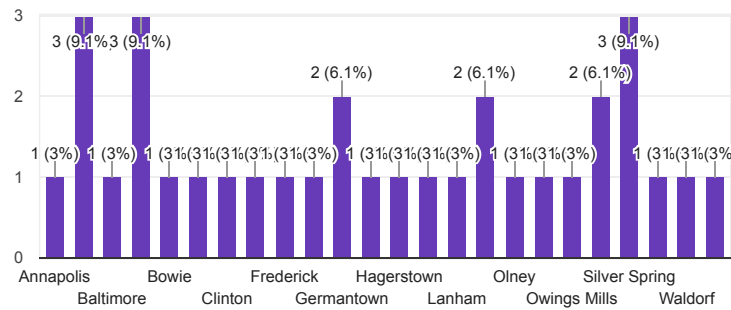
## Are you a resident of Maryland?

35 responses



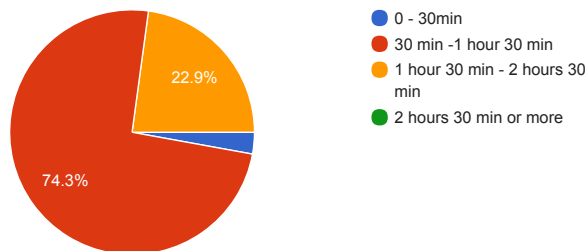
## Where in Maryland do you live?

33 responses



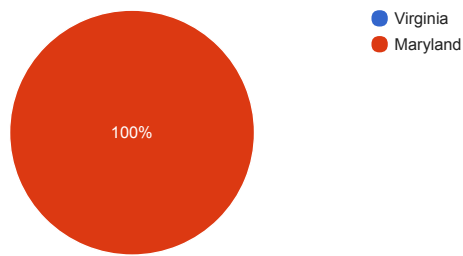
## How long does it take you to commute to the Standard College one way?

35 responses



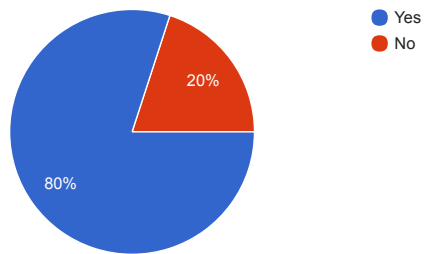
## Would you prefer to participate in a Clinical Experience in Maryland or Virginia?

35 responses



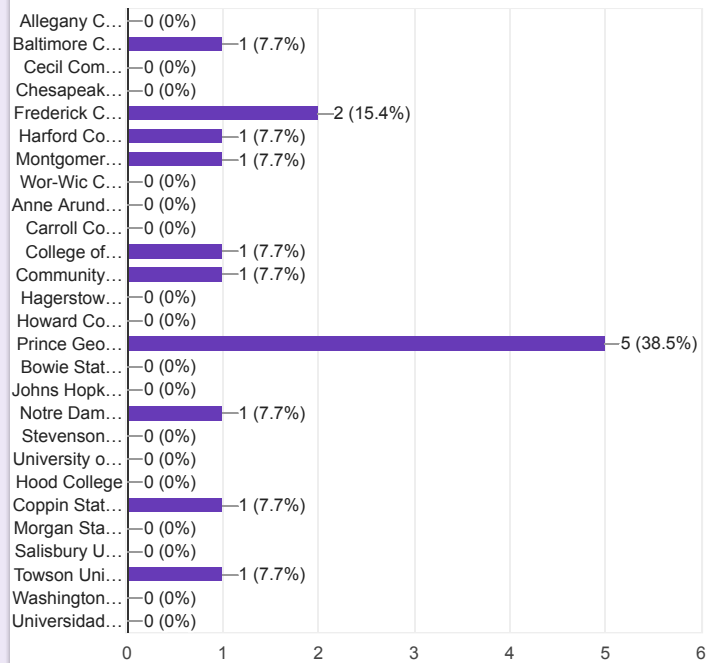
## Have you ever applied or considered applying to a Nursing program in Maryland?

35 responses



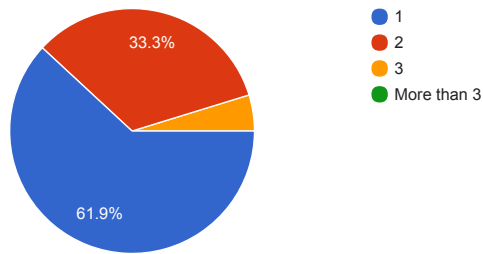
## Which Maryland nursing school did you applied to?

13 responses



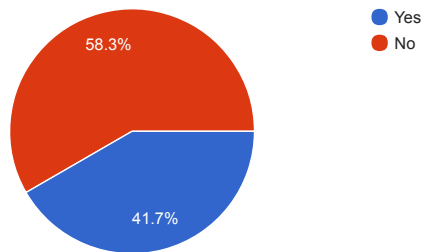
### How many times have you applied to any Nursing program in Maryland?

21 responses



### If you applied, were you accepted in a Nursing program in Maryland?

24 responses



### If you were ACCEPTED, please state the reason for NOT attending the Nursing program in Maryland.

14 responses

- Schedule (5)
- Schedule (3)
- Lost of School Accreditation
- Curriculum Conflict
- School Closed
- Negative Reviews
- Job Conflict
- Schedule and did not offer accelerated program

### If you were NOT ACCEPTED, please state the reason you were not accepted in a Nursing program in Maryland.

10 responses

- Waiting List (3)
- Low GPA (2)
- Not Sure

Not enough students

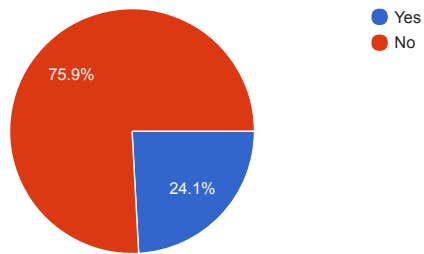
Prerequisite Conflict

Waiting List

School did not accept credits

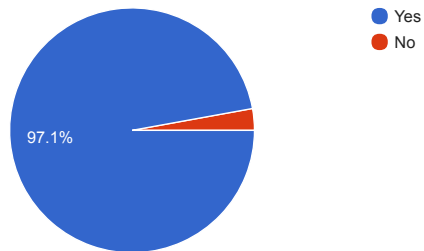
Did the Nursing program in Maryland program offer a schedule that was convenient for you?

29 responses

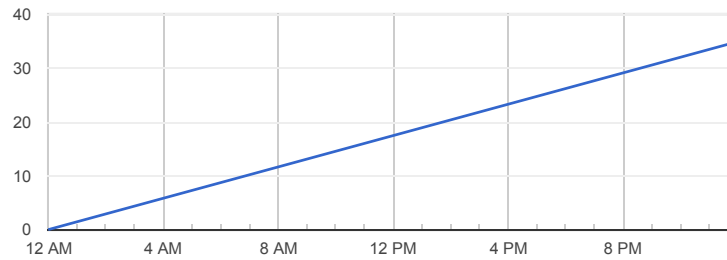


Do you plan to further your education in nursing after you graduate from Standard College?

35 responses



Number of daily responses



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