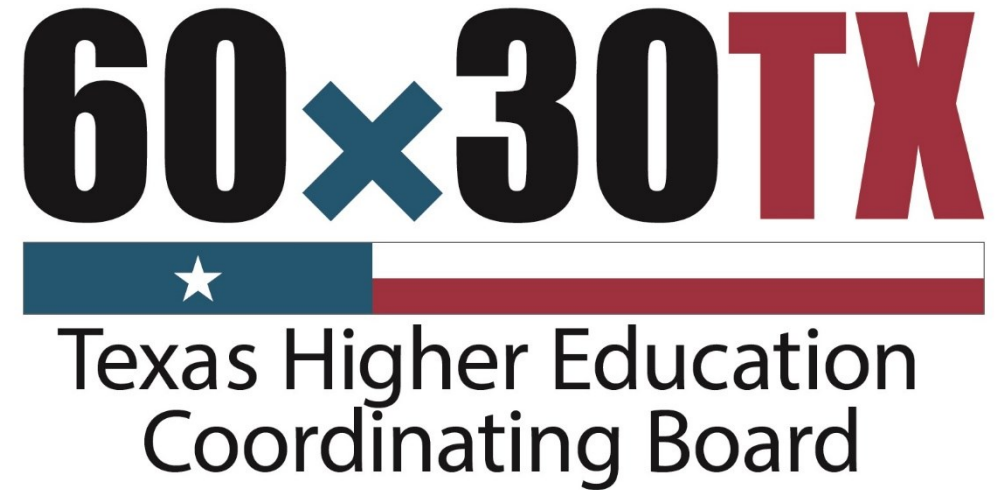


Sam Houston State University D.O. Proposal: Summary of Staff Perspectives

Stacey Silverman, Ph.D.
Academic Quality and Workforce
August 14, 2018



Summary of Staff Perspectives

- It is not evident from information provided in SHSU's proposal or subsequent information that the proposed program would effectively address the need for primary care health services in rural areas.
- The proposed program's budget depends on a high-tuition/low-cost model. It is not evident from the proposal or subsequent documentation how the proposed medical school would be funded should projections not be realized without potentially relying on state funds (i.e. formula funding, special item funding, debt services for tuition revenue bonds, etc.) now or in the future.
- Sam Houston State University (SHSU) does not currently have related academic programs, core of faculty, and physical or administrative infrastructure necessary to sustain a high-quality program.
- SHSU has not submitted a **specific** plan regarding how the institution will provide sufficient first-year residency positions for graduates, pursuant to the provisions and intent of SB 1066, 85th Legislature, Regular Session.

Statutory Requirements on Degree Reviews

- TEC 61.0512 states that, “the board may not summarily disapprove a program without completing the review required by this section.”
- Statute specifies four criteria the proposed program **must** meet during the review. Statute does **not** limit the Coordinating Board to considering **only** these criteria in deciding whether to approve the degree program (per TEC, 61.0512(c)(4)).
- The staff review of this and all program proposals **incorporates these criteria broadly as well as specific factors established in the Texas Administrative Code, such as workforce demand, student financial assistance, and library and IT resources, to fully inform the Board.**

The Coordinating Board is statutorily directed to consider *at least* the following four criteria when reviewing program proposals

Per TEC 61.0512

(c) The board shall review each degree or certificate program offered by an institution of higher education at the time the institution requests to implement a new program to ensure that the program:

- (1) is needed by the state and the local community and does not unnecessarily duplicate programs** offered by other institutions of higher education or private or independent institutions of higher education;
- (2) has adequate financing** from legislative appropriation, funds allocated by the board, or funds from other sources;
- (3) has necessary faculty and other resources to ensure student success;** and
- (4) meets academic standards** specified by law or prescribed by board rule, including rules adopted by the board for purposes of this section

Statutory Criterion 1: *"The program is needed by the state and the local community and does not unnecessarily duplicate programs offered by other institutions of higher education or private or independent institutions of higher education."*

Staff Perspective: Proposed program does not meet the criterion

- There are needs for **specific specialties** and in **specific regions** such as **rural Texas**.
- It is not evident from the information provided in the proposal and subsequent information **how the SHSU D.O. would meet these needs:**
 - ✓ There's **no evidence** that SHSU proposed D.O. model would lead to graduates practicing in rural areas in significant numbers. Completing a residency in a rural community is much more impactful on a physician's practice location. However, developing a new residency program in a rural community is difficult.
 - ✓ The **demographic trend in Texas and across the nation** is that **young people are leaving rural areas for urban and suburban areas**. This trend is at odds with SHSU's assumptions of large numbers of graduates pursuing rural service.
 - ✓ The **significant loan debt** D.O. students would incur **due to high tuition costs** and **lack of financial aid may compel many to practice in higher paying specialties and in higher paying areas**.

Statutory Criterion 1: *"The program is needed by the state and the local community and does not unnecessarily duplicate programs offered by other institutions of higher education or private or independent institutions of higher education."*

Staff Perspective: Proposed program does not meet the criterion

- Other initiatives would **more directly and more efficiently** address the specific need of **increasing access to primary care** services in **rural communities**:
 - ✓ Expanding the use of **telehealth/telemedicine** as a supplement to the rural health care workforce.
 - ✓ Increasing the number of **nurse practitioners** and **physicians assistants** in rural areas.
 - ✓ Supporting the creation and operation of **rural residency programs** through the existing state-funded Family Practice Residency Program and GME Expansion Planning Grants.

Statutory Criterion 2: *"The program has adequate financing from legislative appropriation, funds allocated by the board, or funds from other sources."*

Staff Perspective: Proposed program does not meet the criterion

- SHSU's proposal is **dependent on a high-tuition, low-cost model for its funding**. If projected revenues or costs are not realized, it is not evident how the institution would sustain the program without state funding (i.e. formula funding, special item funding, debt service on tuition revenue bonds, etc.).
- SHSU's proposal and subsequent information increases tuition and fees in year 10 of the proposed program to \$61,868, three times greater than the average Texas public medical school. Estimated costs are substantially below those of other recent medical schools, despite little existing infrastructure.
- As a statutory matter, **a requirement not to seek or accept state funding cannot be enforced by the Coordinating Board once the degree is approved** (TAC 61.0512(f)).

Statutory Criterion 3: *"The program has necessary faculty and other resources to ensure student success."*

Staff Perspective: Proposed program does not meet the criterion

- SHSU proposes to fill **25 new faculty positions by fall 2020**. It would be extremely difficult to hire this number of **high-quality faculty** within this timeframe. Furthermore, SHSU currently does not have expertise in hiring the necessary faculty since it has limited institutional experience in the health professions and no track record at the doctoral level in health-related programs.
- While SHSU has identified donated land, there is **no existing physical or administrative infrastructure** in Conroe to support the medical school.

Statutory Criterion 4: *"The program meets academic standards specified by law or prescribed by board rule, including rules adopted by the board for purposes of this section. . ."*

Staff Perspective: Proposed program does not meet this criterion

Under Coordinating Board Rule 5.46, "requests for new doctoral programs must provide information and documentation demonstrating that the proposed programs **meet all of the following criteria.**"

There are 19 criteria total under this section.

- Design of the proposed program
- Freedom of inquiry and expression
- **Programs at the master's and bachelor's level**
- Need for program
- **Faculty resources**
- Critical mass of superior students
- On-campus residency expectations
- **Adequate financial assistance**
- Carefully planned program
- **External learning experiences**
- **Support staff**
- **Physical facilities**
- Library and IT Resources
- **Costs and funding**
- Program evaluation standards
- Strategic plan
- Marketable skills, and
- First doctoral program

Statutory Criterion 4: *"The program meets academic standards specified by law or prescribed by board rule, including rules adopted by the board for purposes of this section. . ."*

Staff Perspective: Proposed program does not meet the criterion

- Notably, the proposal is insufficient on:
 - Rule 5.46(3): "Doctoral programs, in most instances, should be undergirded by quality programs in a wide number of disciplines at the undergraduate and master's levels. Quality programs in **other related and supporting doctoral areas must** also be available."
 - Unlike other public universities with recently-approved medical schools, SHSU has no doctoral-level biology, biomedical, public health, nursing, pharmacy, optometry or chemistry programs.

Statutory Criterion 4: *"The program meets academic standards specified by law or prescribed by board rule, including rules adopted by the board for purposes of this section. . ."*

Staff Perspective: Proposed program does not meet the criterion

- 5.46(5)(A): "If an institution is required to hire additional faculty prior to opening the proposed program and enrolling students, the institution **will provide documentation on a schedule determined** by the Coordinating Board of the faculty hires through submission of a letter of intent, curriculum vitae, and a list of courses in the curriculum that the faculty hire would be qualified to teach. **Proposed recruitment of such faculty shall not meet this criterion.** No authorized doctoral program shall be initiated until qualified faculty are active members of the department through which the program is offered."

Statutory Criterion 4: *"The program meets academic standards specified by law or prescribed by board rule, including rules adopted by the board for purposes of this section. . ."*

Staff Perspective: Proposed program does not meet the criterion

- Rule 5.46(9): "There should be adequate financial assistance for doctoral students so as to assure that most of them can be engaged in full-time study. **Initially, funds for financial assistance to the doctoral students usually come from institutional sources.** As the program develops and achieves distinction, it increasingly shall attract support from government, industry, foundations, and other sources."
 - SHSU provided clear communication that it would **not** provide financial support for its students but would "provide mandatory counseling services to its students." The institution stated in its proposal that an emphasis would be placed on student loan debt repayment.

HCR 102, 85th Texas Legislature, Regular Session

(Author: Chairman J.M. Lozano

Senate Sponsor: Senator Charles Schwertner)

**HCR 102 (Passed the Texas Senate 31-0, Passed the Texas House 134-12;
Signed by the Governor on 6/15/17)**

- Expresses the Legislature's support for **prioritizing a substantial increase in funding for graduate medical education** before it considers authorizing the creation and support of additional medical schools.
- Charges the Texas Higher Education Coordinating Board to work with institutions of higher education and the medical community to **achieve the 1.1 to 1 goal** for graduate medical education.
- Texas is **currently just at the 1.1 to 1 ratio** of first-year residency positions to medical school graduates. It will require **an additional \$60.15 million** in GME Expansion Grant funding next biennium just to keep up with additional graduates **from currently operating medical schools.**

SB 1066, 85th Texas Legislature, Regular Session

(Authors: Senators Schwertner, Buckingham, Campbell, Huffman, Nelson
Co-Authors: Bettencourt, Hinojosa, Kolkhorst, Seliger, Zaffirini)

**SB 1066 (Approved in the Texas Senate 31-0, Unopposed in the Texas House;
Signed by the Governor on 6/12/17)**

- Requires an institution proposing an M.D. or D.O. degree to provide a **“specific plan regarding the addition of first-year residency positions** for the graduate medical education program to be offered in connection with the new degree program.”
- The **plan must propose an increase in the total number of first-year residency positions in the state sufficient to reasonably accommodate theirs and other medical schools’ projected graduates.**
- **Submission of such a specific plan is required for approval.**

SB 1066, 85th Texas Legislature, Regular Session

(Authors: Senators Schwertner, Buckingham, Campbell, Huffman, Nelson)

Co-Authors: Bettencourt, Hinojosa, Kolkhorst, Seliger, Zaffirini)

Staff Perspective: Proposed program does not offer a specific plan

- The SHSU proposal includes analysis from a consultant that there is *the potential* for 173-235 first-year residency positions in the region.
- However, whether that **potential will result in actual first-year residency positions is uncertain.**
 - The proposal and subsequent information provided a list of potential hospitals that currently don't have residency programs. The institution did not **include drafted or signed contracts with potential GME hospitals, community health centers, local foundations that provide firm commitments to create residency positions.**
 - The proposal **does not include a timeline or budget for securing residency positions.** Given that SHSU proposes to enroll students in fall 2020, **a minimum of 75 newly established first-year residency positions would be needed in 2024.**