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September 30, 2009

MEMORANDUM

To: Mr. Ken Wingate, Chairman, and Members, Commission on Higher Education

From: Dr. Bettie Rose Horne, Chairman, and Members, Committee on Academic Affairs and Licensing

**Consideration of Request for Amendment to Existing License
to Add a New Program
Doctor of Pharmacy, South University at Columbia**

Summary

South University (<http://www.southuniversity.edu>) requests approval of an amendment to its license to offer in Columbia a program leading to the Doctor of Pharmacy degree to begin advertising immediately and begin classes on June 14, 2010. Delivery of didactic and related curricular content between the Columbia campus and the Savannah campus will be accommodated via Tandberg video conference technology for synchronous, two-way communication and interaction. Laboratory and small group components of the program will be delivered in traditional, face-to-face format. The new pharmacy facility on the Columbia Campus is designed to support all present and envisioned educational methodologies of delivery and components of the curriculum including pharmacy skills laboratories, physical assessment laboratories, small group recitations, and problem-based learning activities.

South University of Carolina, Inc., a South Carolina corporation, is a 100 percent owned subsidiary and branch campus of South University, Inc., in Savannah, Georgia, which, in turn, is owned by Education Management Corporation (EDMC), a Pennsylvania company. South University currently has campuses located in Columbia,

South Carolina (1,100 students); Savannah, Georgia (8,700 students); West Palm Beach, Florida (845 students); Tampa, Florida (500 students); Montgomery, Alabama (540 students); and Richmond, Virginia (opening August 2009). The Commission licenses South University to offer at the Columbia location programs leading to the associate, bachelor, and master degrees in business, legal, information technology, and counseling majors.

South University is accredited by the Commission on Colleges of the Southern Association of Colleges and Schools (COC-SACS) to award associate, bachelor, master, and doctoral degrees. On April 13, 2009, South University officials notified COC-SACS of the proposed offering of the Pharm.D. on the Columbia campus. In a letter dated June 19, 2009, COC-SACS President Belle Wheelan notified South University that no further information was needed for inclusion in the accreditation since both the Columbia site and the program are approved.

South University School of Pharmacy in Savannah is accredited by the Accreditation Council for Pharmacy Education (ACPE) through June 30, 2012. The South University Columbia Campus pharmacy program will be an extension of the existing program and, upon approval of the substantive change proposal by ACPE, will be accredited when the first class matriculates on June 14, 2010. ACPE has authorized a site visit in the fall of 2009. Approval in January of 2010 to initiate the program in June 2010 is expected based on the evaluation team report to be presented to the Council. Subsequent accreditation for the South University Doctor of Pharmacy program will include both campuses as a single degree entity.

The following information from the U.S. Department of Education (USDE) shows student loan default rates at South University.

OPE ID	School	Type	Control	PRGMS		FY2006	FY2005	FY2004
013039	South University 709 Mall Boulevard Savannah GA 31406-4881	Master's Degree or Doctor's Degree	Proprietary	Federal Family Education Loan (FFEL) and Federal Direct Loan (FDL)	Default Rate	5.6	3.8	4.6
					No. in Default	119	60	61
					No. in Repay	2120	1571	1299

The USDE sanctions a school when the school's three most recent cohort default rates are 25 percent or higher or if a school's current default rate is greater than 40

percent. Except in the event of a successful adjustment or appeal, such a school will lose Federal Family Education Loan, Direct Loan, and Federal Pell Grant program eligibility for the remainder of the fiscal year in which the school is notified of its sanction and for the following two fiscal years. South University's default rates are far below this standard.

According to South officials, the average student loan debt for graduates of South's program offered in Savannah leading to the Pharm. D. is \$123,380.

South University officials will initially house 10 full-time faculty members and staff and six part-time faculty members within the existing facilities. In May 2010 the program will move into new 26,000 square-foot facilities currently under renovation. The space is adjacent to the present Columbia campus at 9 Science Court (off Farrow Road and Parklane Drive near I-77). This facility was designed to duplicate the educational processes employed on the Savannah campus and improve on the original design. It includes an administrative office suite, faculty office suite, and educational suite. There are two 94-seat tiered classrooms partitioned to open into one 188-seat room equipped with complete Tandberg two-way video conferencing capability and two 50-seat classrooms equipped with partitions to open into one 100-seat room or subdividing into four 25-seat rooms or eight 12-seat rooms. The education suite also includes four conference rooms designed to seat 10-12 individuals; a 48-station teaching lab with appropriate storage areas, a Sterile Products Lab with barrier design, a mock pharmacy/clinical pharmacy, patient counseling area, six patient counseling/exam rooms with educational video technology, and a clean lab for analyses in a non-corrosive environment. The facilities will also include a research area designed to accommodate the activity of at least six researchers.

While hard copies of selected reference and learning resources will be available through the Columbia campus library and the Drug Information Center, other virtual resources will be developed identical to those available through the Savannah campus and consistent with those suggested by the American Association of Colleges of Pharmacy Core Journal List and Basic Resources for Pharmacy Education. The recent addition of a proxy server to the University system for the School of Pharmacy will allow distribution of electronic journals and pharmacy-related databases to remotely located students, preceptors, and staff.

The organizational structure of the School of Pharmacy will be an expansion and extension of the present organizational structure. The associate dean of pharmacy in Columbia will be the chief Columbia campus administrator and the primary supervisor of all employees of the Columbia pharmacy program. This associate dean will report directly to the dean of the School of Pharmacy in Savannah. Departmental associate chairs will facilitate faculty workload assignments and address discipline-specific academic issues at the Columbia campus with support and coordination of their

respective department chairs in Savannah. Departmental associate chairs report to the campus associate dean for operational matters and to the respective department chairs in Savannah regarding departmental curricular issues. The assistant dean for student affairs/director of admissions and the experiential education coordinators will work in conjunction with their administrative counterparts in Savannah and will report to the campus associate dean for operational matters.

The 14 faculty positions and five staff positions required to fully implement the program on the Columbia campus will complement the faculty and staff on the Savannah campus where 13 Ph.D. faculty members are in the Department of Pharmaceutical Sciences, four faculty members each in pharmaceuticals, pharmacology and medicinal chemistry, and one in epidemiology.

Pharmaceutical Sciences faculty will normally possess the appropriate Ph.D. degree in the pharmaceutical or biomedical sciences and pharmacy practice faculty the Doctor of Pharmacy degree. Individuals who do not have the doctoral degree but possess appropriate professional credentials and academic experience may qualify for a faculty appointment at an appropriate level.

Applicants to the program must have completed a pre-pharmacy curriculum of 63 – 68 college semester hours with a cumulative grade point average of 2.8 on a 4.0 point scale; no grade less than a C will be accepted for prerequisite courses. Applicants must successfully complete all prerequisites by the end of the Spring 2010 term to qualify for the inaugural class in Columbia, to begin June 14, 2010. Interviews for selected, qualified applicants will be scheduled beginning in October 2009 and will continue through March 2010.

Pre-requisites Courses	Semester Hours	Quarter Hours
Literature (English, American, or World)	3	5
English Composition (One English Composition course is required. A second English Composition will not be accepted in lieu of a Literature course, but may count as an elective.)	3	5
General Chemistry I and II with Laboratory (a "live" lab and II completed since 2002–2003)	8	12
Organic Chemistry I and II with Laboratory (a "live" lab)	8	12
General Biology I and II with Laboratory (a "live" lab and II completed since 2002–2003)	8	12
Anatomy and Physiology I and II (lab recommended but not required)	8	12
Calculus	3	5
Economics	3	5
History	3	5
Physics I	3	5
Psychology	3	5
Public Speaking	3	5
Electives 9 15 (three semester hours in the humanities and the remainder in social sciences, arts, or humanities)	9	15
Totals	63-68	95-102

Officials at South University project enrollment of 65 full-time Doctor of Pharmacy students for the term that begins June 14, 2010. The class size of subsequent incoming classes may increase by five students each year, reaching a maximum class size of 90 students.

The 2009 full-time tuition will be \$9,195 per quarter or \$820 per credit hour for part-time students. At the current rate, full-time students may complete the program in 12 quarters at a total tuition cost \$110,340. The South University Doctor of Pharmacy Curriculum, which is identical for the Savannah and Columbia campuses, consists of 218.5 quarter credit hours. The following table shows the curriculum content.

South University School of Pharmacy Curriculum		
Quarter 1 (Summer Quarter)	Quarter Hours	Term Total
PHA3101 Biochemistry I	3	
PHA3107 Pharmaceutical Calculations	2	
PHA3113 Pathophysiology I	5	
PHA3115 Pharmaceutical Analysis	2	
PHA3119 Professional Practice & Informatics	2	
PHA3135 Integrated Pharmacy Skills Lab I	2	
PHA3150 Health Care Systems	2	18.0
Quarter 2 (Fall Quarter)		
PHA3102 Biochemistry II	3	
PHA3114 Pathophysiology II	4	
PHA3116 Pharmaceutics I	4	
PHA3136 Integrated Pharmacy Skills Lab II	2	
PHA3152 Communications	2.5	
PHA3159 Introduction to Integrated Sequence	2.5	
PHAXXXX LPPE I	.5	18.5
Quarter 3 (Winter Quarter)		
PHA3109 Microbiology/Immunology	5	
PHA3110 Molecular Biology	3	
PHA3117 Pharmaceutics II	2	
PHA3124 Pharmacotherapy I – OTC/Herbals	2	
PHA3137 Integrated Pharmacy Skills Lab III	2	
PHA3162 Integrated Sequence I	4	
PHAXXXX LPPE II	.5	18.5
Quarter 4 (Spring Quarter)		
PHA4212 Pharmacokinetics I	4	
PHA4225 Pharmacotherapy II	3	
PHA4238 Integrated Pharmacy Skills Lab IV	1	
PHA4254 Pharmacy Law & Ethics	2	
PHA4264 Integrated Sequence II – Infectious Disease	5	
PHA4265 Integrated Sequence III – Inflammation	3	
PHAXXXX LPPE III	.5	18.5
Quarter 5 (Summer Quarter)		
PHA4280 Community Professional Practice Experience	8	
PHA4281 Institutional Professional Practice Experience	8	16.0
Quarter 6 (Fall Quarter)		
PHA4228 Pharmacokinetics II	3	
PHA4236 Leadership and Advocacy	1	
PHA4335 Clinical Epidemiology and Biostatistics	3	
PHA4367 Integrated Sequence IV – Autonomics	5	
PHA4368 Integrated Sequence V – GI/Hepatic Therapeutic	3	
PHA**** Electives (various)	3	
PHAXXXX LPPE IV	.5	18.5
Quarter 7 (Winter Quarter)		

PHA5333 DI, Lit. Evaluation, Research Design & Methods	3	
PHA5353 Pharmacy Practice Management	3	
PHA5369 Integrated Sequence VI – Cardiology	7	
PHA5370 Integrated Sequence VII – Renal Therapeutic	3	
PHAXXXX LPPE V	.5	16.5
Quarter 8 (Spring Quarter)		
PHA5331 Applied Pharmaceutical Care I	4	
PHA5371 Integrated Sequence VIII – CNS	6	
PHA5372 Integrated Sequence IX – Endocrine Therapeutic	4	
PHA**** Electives (various)	3	
PHAXXXX LPPE VI	.5	17.5
Quarter 9 (Summer Quarter)		
PHA5332 Applied Pharmaceutical Care II	3	
PHA5334 Complementary and Preventive Medicine	3	
PHA5354 Health Economics and Outcomes Assessment	3	
PHA5373 Integrated Sequence X – Critical Care	4	
PHA5374 Integrated Sequence XI – Oncology	2	
PHA**** Electives (various)	3	
PHAXXXX LPPE VII	.5	18.5
Quarters 10, 11, & 12 (Fall, Winter, Spring Quarters)		
PHA6338 Grand Rounds	1	
PHA6482 Advanced Professional Practice Experience – Community	8	
PHA6483 Advanced Professional Practice Experience – Ambulatory Care	8	
PHA6484 Advanced Professional Practice Experience – Internal Medicine	8	
PHA6485 Advanced Professional Practice Experience – Med. Specialty	8	
PHA6486 Advanced Professional Practice Experience – DI/Med Specialty OR		
PHA6488 Other Approved Rotation	8	
PHA6487 Elective I Rotation	8	
PHA6489 Advanced Professional Practice Experience – Directed/Elective I	8	
PHA6490 Advanced Professional Practice Experience – DI	1	58.0
TOTAL		218.5

Graduates are licensed in their states of practice by the authority of their respective state Boards of Pharmacy (BOP). Licensure in South Carolina is through the Department of Labor, Licensing and Regulation (LLR), Board of Pharmacy (BOP). Prerequisites to BOP licensure are a B.S. degree in Pharmacy or Doctor of Pharmacy degree, completion of an internship or other program approved by the BOP, a passing grade on the North American Pharmacist Licensure Examination (NAPLEX) of the National Association of Boards of Pharmacy (NABP), and a passing grade on the Multistate Pharmacy Jurisprudence Examination (MPJE). The applicant must also demonstrate that he or she is authorized to be present in and, if appropriate, to work in the United States. The BOP may refuse, cancel, fine, suspend, revoke, or restrict the authorization to practice of an individual who has been convicted of or has pled guilty to a felony or crime involving drugs or moral turpitude if the criminal conviction directly relates to the profession or occupation; who has been disciplined by another licensing authority; or who is found by the BOP to be otherwise unfit or unsuited to engage in the profession or occupation.

According to the proposal, the landmark publication by Dr. David Knapp published in January 2002 (Knapp, David A., "Professionally determined need for pharmacy services in 2020," *American Journal of Pharmaceutical Education*, **66**, 421-429, 2002) projected a shortfall in the profession of 157,000 pharmacists nationally by

2020. Using recent data, the combined impact of the expansion of existing programs and the recent addition of 20+ new pharmacy schools is estimated to reduce the projected shortage of pharmacists to between 115,000 and 120,000 in 2020. In December 2008 the Department of Health and Human Services' Health Resources and Services Administration, Bureau of Professions, published a document on pharmacy manpower entitled *The Adequacy of Pharmacist Supply: 2004 to 2030*. This report analyzes the dynamics of the supply and demand for pharmacists, citing growth in both the number and type of opportunities for pharmacists. This document can be accessed at <http://www.healthworkforceinfo.org/topics/resources.php?id=118> .

At the Savannah campus for the class entering June 2009, South University School of Pharmacy received 1,152 applicants for a desired yield of 92 seats. The School accepted 194 applicants and 94 students matriculated which resulted in an applicant-to-matriculate ratio of approximately 13:1. Graduates have a three-year (2006, 2007, and 2008) composite first-time pass rate for the NAPLEX exam of 92.1%. Overall, graduates have a 99.5 % NAPLEX pass rate.

The only existing pharmacist program offered in South Carolina is at the South Carolina College of Pharmacy (SCCP), comprised of the former USC and MUSC colleges of pharmacy. The program is currently in ACPE candidate status and should graduate its first class in May 2010. Presbyterian College is currently progressing toward ACPE pre-candidate status with the intention of enrolling its first class in fall semester 2010.

Recommendation

The Committee on Academic Affairs and Licensing commends favorably to the Commission an amendment to the existing license of South University to begin advertising and recruiting students immediately into the program leading to a Doctor of Pharmacy degree to be offered at the Columbia location. The Committee further recommends that the Commission delegate to the staff the authority to license the site in Columbia when the facility has been developed.