

Joint Response to Petitioners Seeking Moratorium on Accreditation of New PharmD Institutions

February 17, 2019

This response is submitted on behalf of those organizations identified in [petition to stop accreditation action on new schools of pharmacy until 2030](#).

First, we acknowledge that the current economic and political environment have created concerns within the pharmacy profession for pharmacists' job security, professional growth and well-being. The market for pharmacist employment has shifted from a recognized shortage in the early 2000s to a surplus in some practice areas today, where expanded roles for pharmacists are growing more slowly than expected. These expectations were based on predictions that the demand for pharmacists would be driven by the Affordable Care Act and the increased number of individuals with health insurance and on medications, as well as the increased inclusion of pharmacists on healthcare teams. These projected opportunities, identified by individuals and entities within and outside of the profession, served as one of the factors driving the growth of new educational institutions. The profession continues to push for recognition and expanding roles for pharmacists, and progress is being made, even if not at the desired rate for any of us.

The organizations and entities who have an interest in our profession's educational systems continuously monitor the dynamics of enrollments, graduations and conditions in the national market for pharmacists and pharmacy services. Continuous dialogue is maintained regarding the profession's ability to meet individual patient and community healthcare needs. These discussions have resulted in changes to accreditation standards, changes in scopes of practice, and other appropriate responses. When issues arise regarding education quality and delivery, the Accreditation Council for Pharmacy Education (ACPE) is the body responsible for evaluating and responding in accordance to established guidelines and standards.

[AACP](#), [APhA](#), and [NABP](#) worked together 87 years ago to establish [ACPE](#) as an independent agency that uses consensus-based criteria to evaluate the quality of pharmacy education programs. We have confidence that ACPE applies standards that have continuously evolved to ensure that pharmacists' knowledge, skills and abilities equip them to provide an expanding portfolio of patient care services in all practice settings. ACPE monitors data to ensure accredited programs are admitting qualified students, have adequate resources (faculty, practice sites, preceptors, facilities and finances), and are supporting students to graduate on time, perform well on the North American Pharmacist Licensure Examination (NAPLEX) and receive proper career

counseling (from their decision to attend the program through their employment decisions).

Market factors impacting healthcare and professional practice, as well as educational institutions, are key determinants of a college/school's viability or the starting of new schools. ACPE has been advised by its legal counsel that for them to invoke a moratorium on the accreditation of additional schools to address changing market forces would violate antitrust laws and regulations as restraint of trade. The other organizations named in this petition (AACP and APhA) simply are not in a position either to invoke a moratorium.

Individually and together our organizations work every single day to promote the value of pharmacists' patient care services and to support practitioners as they work on the front lines of our rapidly changing health care system. There is no one solution that will resolve the current environment. We commit ourselves to continuing our collaborative work to best position pharmacists in the changing healthcare environment and to expand opportunities for pharmacists to serve patients and help them live healthier and better lives. We look forward to working productively with you.

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