**Critical Review of the AOTA Representative Assemble (RA) Motion**

***Single Point of Entry for Occupational Therapists***

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A main justification for a single doctoral point of entry for OTs provided in this motion is that ACOTE must ensure that education programs “at least conform to commonly accepted standards” (p .2). The motion originators state that entry-level graduate programs “exceed what is commonly accepted as the requirements for a master’s degree in the U.S” (p. 2) and that “recent data from ACOTE indicate that the average number of credit hours for an occupational therapy entry-level master’s degree is 86” (p. 2). The point that high credit loads justify a single doctoral point of entry for OTs is made multiple times in this motion’s rationale. Because there is no reference provided to support this claim, it is impossible to determine if programs with very high credit loads skewed this finding. It is established practice for mean data to be accompanied by the standard deviation (SD); however, no SD is provided in this rationale.

The likelihood that master’s programs with very high credit loads influenced this average must be considered before a single doctoral point of entry for OTs is established. This motion completely ignores the reality that there are accredited master’s degree programs which effectively use a 4-1 or a 3-2 baccalaureate and graduate degree format that do not exceed the “commonly accepted as the requirements for a master’s degree in the U.S” (p. 2). To mandate these programs out of existence will exacerbate several key concerns (i.e., practitioner diversity, student debt, viability of city, state, and historical black colleges’ OT programs) put forth in the AOTA Special Task Force February 2019 Summary Report and the critical review and content analysis of the ACOTE’s OTD mandate decision background materials. These documents are provided as attachments to the email message accompanying this RA motion review.

The motion’s originators provide data in their rationale from other accrediting bodies “when available” (p. 4) and note that when no data was available from professional associations “sample data (was) pulled from specific university program websites” (p. 5). They also state that “while federal data is not available, U.S. News and World published a story on the requirements for master’s degrees in the U.S.” (p. 6). This data is very weak and provides no justification for a single doctoral point of entry for OTs. The originators further state that “the only reliable way to compare outcomes would be to compare data from institutions that offer both degrees. Washington University in St. Louis is the only one university in the U.S. that has offered both entry-level degrees long enough to have a data sample large enough to do this comparison” (p. 7). While I have the deepest respect for Washington University’s OT programs, the findings of singular study *cannot be generalized* and the outcomes of one University should not be used to justify a nation-wide mandate.

While the quantitative data provided by the motion’s originators does not substantiate the need for a single doctoral point of entry for OTs, they are accurate in their statement that “occupational therapy students deserve credit and recognition for the intensity of their current educational preparation. To do otherwise is an injustice” (p. 7). Yet, their rationale for a single doctoral point of entry for OTs ignores the reality that master’s degree programs with excessive credit loads *have had the ability to offer doctoral degrees since 2006*. Why programs with these excessive credit loads have not already transitioned to an OTD is perplexing, and perhaps, unjust. However, this inaction and potential injustice are not valid reasons for the RA to support a single doctoral point of entry for OTs. The resulting injustices that can result from the elimination of choice in entry-level education should not be ignored and must be studied before an entry-level doctoral degree is required for OTs.

The motion’s originators are concerned that “continuing to accredit occupational therapy entry-level master’s programs with massive credit hour requirements will jeopardize the ability of ACOTE to maintain compliance with this USDE recognition criterion and any findings of non-compliance with the criterion may jeopardize ACOTE’s ability to maintain its recognition by USDE” (p. 7). The validity of this unsubstantiated statement is highly questionable; however, there is no need for the RA to address this concern. If this concern is valid, the ACOTE can establish credit load standards for master’s and doctoral degree programs that enables their full compliance with USDE education standards.

The motion’s originators use the ACOTE report of the number of OTD program applications they have approved and received to demonstrate support for the single doctoral point of entry for OTs. This unsubstantiated conclusion also needs to be questioned. When ACOTE’s OTD mandate was first made, the ACOTE negated all expressed concerns about a single doctoral entry-point for occupational therapists and maintained that they had the sole decision-making power for entry-level education.  As a result, many programs took the ACOTE mandate as a fait accompli and completed applications for an OTD program. After many voices confronted ACOTE's claim of sovereignty over the determination of the profession’s entry-levels, the mandate was put into abeyance. Still many thought the mandate was "inevitable" and proceeded with their OTD plans. It is important to recognize that the RA vote to support dual entry-level degree education for OTs and OTAs was made on April 4, 2019, which is very close to the end of the academic year for numerous colleges and universities. For many of these institutions, the curriculum review and development process does not resume until the beginning of the next academic year (AY). The reported ACOTE data is from August 2019. Thus, this data may not remain accurate as some programs may decide to withdraw their applications after they complete their curriculum review and development process during AY 2019-2020. It would be informative to survey the program directors of applicant programs and determine if their application was based on a commitment to a doctoral single-point of entry or a perceived or real press to make this change. Unfortunately, the continued press by a small group of individuals *who do not represent the profession’s majority* for a single doctoral entry point for OTs *without providing any evidence for this need*, will complicate and potentially compromise this process. The reality that administrators who view increased credit requirements as a desirable income source cannot to be ignored.

Regardless of the number of willing or coerced OTD program applications, there is no need for a RA motion to develop policies that support a single doctoral point of entry. Programs who want to offer an enter-level OTD degree, can. Others can maintain or develop master’s degree programs. Again, the maintenance of choice is key. While this motion ignores the opportunities afforded by choice in entry-level education, our profession’s consumers and future students cannot.