

I am writing to provide an update of the Accreditation Group's review of the complaint you submitted on July 28, 2021, regarding the occupational therapy master's degree program requirements of the Accreditation Council for Occupational Therapy Education (ACOTE or the agency). On August 11, 2021, Department staff initiated an inquiry into your complaint and ACOTE submitted its response on September 10, 2021. Enclosed to this letter are the narrative and exhibits of the ACOTE response to the complaint.

Please note that the Department of Education's (Department) authority over accrediting agencies is through the recognition process, by which the Secretary reviews and recognizes accrediting agencies for the purposes of the Title IV Federal Student Aid programs or access to other federal programs. The recognition process is defined under § 496 of the Higher Education Act of 1965, as amended (HEA), and in Department regulations in 34 C.F.R. Part 602, Subpart B (the Secretary's Criteria for Recognition or Criteria). The primary concern of the Accreditation Group is to ensure that an accrediting agency acts in accordance with both its own policies and procedures and with the Criteria. Per the Department of Education Organization Act, neither the Accreditation Group nor the Department has the authority to take part in any accreditation decisions made by ACOTE or any accrediting agency, as recognized accrediting agencies are independent, voluntary membership organizations.

The main area of concern included within your complaint is that ACOTE is requiring significantly more credits for a program at the master's degree level than is commonly accepted in the greater higher education community for master's degree programs. You specifically reference a failure of ACOTE to meet the requirements of 34 C.F.R. 602.17(a) of the Criteria.

In response to the complaint inquiry, ACOTE provided information and documentation on the entry-level occupational therapy master's degree program requirements in its standards. The agency stated that the standards provide the minimal educational content required for the specific degree and that "ACOTE does not prescribe specific courses and/or credit hours required" for each degree level. ACOTE included its comprehensive standards review process and the opportunity for relevant constituencies to review and comment as documentation of the review of the master's degree requirements by the agency. Department staff noted that the agency's



standard related to program length (Standard A.5.3) states that the "program must document a system and rationale for ensuring that the length of study of the program is appropriate to the expected learning and competence of the graduate." The agency stated that its standards require the sponsoring institution to be accredited by a nationally recognized accrediting agency (Standard A.1.1), to be authorized under applicable law to have degree-granting authority (Standard A.1.2), and to have primary responsibility for granting a certificate or degree at the completion of the program (Standard A.1.4). Based on the agency's narrative, standards and its decision related to your complaint, it appears that ACOTE expects the sponsoring institution and its institutional accrediting agency to review the master's degree program to ensure that it conforms to commonly accepted academic standards, while ACOTE sets the clearly specified educational objectives so that graduates of the programs can meet the requirements to sit for licensure that is set by ACOTE's parent association, AOTA. ACOTE has delegated its responsibility as a nationally recognized accrediting agency to require its programs to maintain requirements that at least conform to commonly accepted academic standards to the accredited program's sponsoring institution's accrediting agency which is not an option within the regulations.

ACOTE also provided additional information and documentation on its systemic review of entry-level occupational therapy master's degree programs. Specifically, the agency provided information and documentation on the difference in length of study and credit load for the entry-level occupational therapy master's degree program versus the entry-level occupational therapy doctoral degree program, to include a 2019 task force review and a review conducted in response to the compliant inquiry. These credit hour reviews reflect an average of 86.15 credits and 81.18 credits for the master's degree level and 111.30 credits and 108.63 credits for the doctoral degree level, respectively. The average credit hours reflected in these reviews by ACOTE do not appear to conform with commonly accepted academic standards for the master's degree level.

Based on the information and documentation provided, the Accreditation Group has determined that ACOTE has not demonstrated that it evaluates whether a program maintains requirements that at least conform to commonly accepted academic standards or the equivalent and therefore, has not demonstrated compliance with 34 C.F.R. 602.17(a) of the Criteria. As ACOTE has submitted a petition for renewal of recognition, the Accreditation Group has incorporated your complaint, ACOTE's response, and the Accreditation Group's determination within the draft staff analysis of that petition. Please be assured that we will continue to review ACOTE's standards, policies, and procedures for compliance with the Criteria.

Thank you for taking the time to share your concerns with the Department.

Sincerely,

**HERMAN  
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Date: 2021.10.20 12:35:19  
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Herman Bounds, Ed.S  
Director, Accreditation Group

Enclosure

Via email cc: Teresa L. Brininger, Director of Accreditation, ACOTE