

In 2014, after a multi-year process evaluating entry-level professional education in OT which involved many experts and stakeholders in the field, the AOTA Board of Directors (BOD) issued a position statement that supported the OTD as a single-point of entry for OT. One of the critical factors weighed in this decision is that in the US Department of Education (DOE) requirements for recognition of ACOTE as an accrediting body there is a requirement that ACOTE has to ensure that the programs they accredit conform to common standards for the degree. All indications then and now still show that OT masters (OTM) programs do not conform to common standard which puts in jeopardy OTM degree programs and ACOTE being able to fulfill this requirement.

This issue highlights the complexity of the relationship between AOTA and ACOTE. ACOTE has to have independent authority to set standards (what has to be taught) and they have to be able to ensure that the degree in which the standards are being taught conform to common standards (the degree requirements) but there is no explicit requirement that they decide which degrees they will accredit. Given this complex relationship, AOTA (parent association) had traditionally allowed ACOTE and higher education institutions to make degree decisions. The OTD was created without RA motion. The bachelor's OTA was created with RA motion. The OTM was created without RA motion. While some cite Resolution J as evidence that the RA makes degree decisions, the actual language in Resolution J states that the RA supports post-bacc entry and they "recommend that ACOTE" consider and if feasible move the standards to post-bacc level. They did not mandate OTM entry and they left the decision with ACOTE. Further, the language in Resolution J acknowledged that OTM programs already existed thereby negating Resolution J as providing the authority for their creation. Following in this precedent, the BOD in 2014 with issuing that position statement again stated that the decision to move to a single point of entry at the OTD level needs to be considered and decided on by ACOTE. Not allowing them to make the entry-level degree decision impedes and/or prevents their ability to meet the requirements they have to fulfill as a DOE recognized accrediting body.

In 2018, after ACOTE issued the mandate to move to a single point of entry at the OTD level by 2027 which was twice praised publicly by the BOD at the time, the BOD decided they wanted to reevaluate this decision in light of some negative feedback from membership. In the ensuing debate, which ended with AOTA making the determination that ACOTE does not have the authority to determine entry-level degrees which they considered a professional policy to be set by the RA, the narrative that was created to support this decision is that ACOTE did not really have the responsibility to determine credit hour requirements and whether they conform to common degree requirements. It was decided that this was really a regional accreditation issue. This narrative is false as stated in the Accreditation Group response to the complaint.

Please see the attached letter. The letterhead has been redacted to protect the identify of persons involved in this discussion. I was given permission to share it by those individuals with this information removed. The letter is signed by the head of the accreditation group at DOE and states the following:

1. AOTA's (ACOTE) assertion that they do not have to ensure programs have to conform to common degree standards, and that this is a regional accreditation issue, is false and the DOE explicitly stated that ACOTE trying to abdicate their role in doing this is not allowed under the regulations
  - a. Therefore, the DOE has now explicitly stated that ACOTE has not demonstrated they are meeting this recognition criterion

2. Further, the DOE has stated that after reviewing the data provided by AOTA/ACOTE they do not believe that OTM programs are conforming to common degree requirements.

ACOTE will now need to respond with a corrective action plan to bring them into alignment with 34 C.F.R. 602.17 (a) of the Criteria. ACOTE now has to figure out a way to enforce a requirement that OTM programs conform to common standards without any authority to eliminate it as a degree option. There is one path forward to solve this crisis. Given the breadth and depth of standards needed to practice occupational therapy, students need to be conferred the degree they have earned, which is, in most cases, an OTD. Alternatively, OTM programs must shave off significant credits (while still trying to meet the necessary standards) in order to be in compliance with common degree requirements, an untenable and improbable option.

The cost of higher education will put this discussion under the microscope once the public hearing is scheduled. The time to be proactive has passed, at the very least, bold action is needed now to protect our profession and the clients it serves. If students are paying for credit hours that equal a doctorate, why would we not want to confer the degree earned?

It is time for the RA to pass a motion eliminating OTM entry. It is also time to review our Memorandum of Understanding (MOU)'s, policies, and procedures for how AOTA and ACOTE interact to ensure that this does not happen again in the future.

If nothing else it is my hope that what we take out of this is that accreditation and higher education policy decisions can't be decided by a yes/no popular poll of the membership.

Thank you,

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