



## ACOTE's Update on Entry Level Education

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ACOTE is the recognized accreditation agency for occupational therapy education in the United States by both the United States Department of Education (USDE) and the Council for Higher Education Accreditation (CHEA). USDE and CHEA regulations require that all actions and decisions of the accreditation agency be made independent from any related professional or trade association. Historically, ACOTE has been the body with the authority to mandate the entry-level degree for occupational therapy education.

### **The ACOTE-AOTA Memorandum of Understanding (MOU)**

The ACOTE-AOTA MOU was developed and mutually agreed to in 2005 by AOTA and ACOTE to clearly delineate a separation between ACOTE and AOTA with respect to issues related to accreditation standards including degree level (2011 Standards-Preamble) and review of entry-level education. The MOU is critical evidence that ACOTE is independent of AOTA as required by both USDE and CHEA. The purpose, scope, and operation of the MOU were not questioned by AOTA for nearly 13 years as both parties faithfully abided by its terms and conditions. USDE and CHEA requirements do not mandate that the accrediting body determine professional entry, but historically, and without objection ACOTE is the recognized accreditation agency for occupational therapy education by USDE and CHEA including general support from AOTA. ACOTE has exercised this authority with respect to the move from a baccalaureate to post-baccalaureate degree entry in April 1999; removal of the certificate level for occupational therapy assistants in April 2008; the baccalaureate degree requirement prior to acceptance to a doctoral program standards (2006 Standards with effective date July 1, 2010); and the move to doctoral level entry for the OT in August 2017; and, baccalaureate level standards for OTA approved in August 2018. ACOTE bears the burden of proof of separation between ACOTE and AOTA as ACOTE is the body granted accrediting authority by the USDE. As a result, translating separation of functions cannot be done independently by AOTA.

### **Movement to Entry at the Doctoral Level**

Since the application for the first entry-level OTD program in 1998, the Council has periodically reviewed the profession's views on the role of the entry-level doctoral degree in the profession. The review took on greater intensity in 2013 when the Council received the **AOTA Future of Occupational Therapy Education Ad Hoc Committee Report recommending the move to require entry at the doctoral level**. The Ad Hoc report was shortly followed by the **AOTA Board of Directors' Statement in 2014 that *"the profession should take action to transition toward a doctoral-level single point of entry for occupational therapists, with a target date of 2025."*** Given these actions, ACOTE entered into a comprehensive and deliberate process to review the issues surrounding the entry-level degree and ensure fulsome input from stakeholder groups. At each meeting,

ACOTE members reviewed reports, surveys, letters, petitions, publications, and proceedings from open hearings reflecting the perspectives of multiple stakeholders. The Council has 25 volunteer members. This includes occupational therapists and occupational therapy assistants, with equal representation from practice and education, one higher education administrator, and three public members. Recognizing that there was not consensus in the community, the members of the Council spent **4 years** carefully reviewing and debating the issue to reach a decision that the Council concluded was in the best interest of both the profession and the recipients of services provided by graduates from the academic programs. While some in the community did not agree with this decision, it was made in good faith and was predicated on years of intense research and fact-gathering.

A great deal has transpired since the publication of the ACOTE mandate in August 2017 that the entry-level degree requirement for the occupational therapist move to the doctoral level by July 1, 2027. The mandate is scheduled to proceed as published and ACOTE continues to devote considerable time and resources to supporting occupational therapy programs through the transition. At present, there are 58 OTD programs (this number includes accredited programs and those in the Candidacy and Preaccreditation phases) and 53 programs that have submitted Letters of Intent to transition to the OTD and are in various stages of the accreditation process. These programs have committed significant time and resources to support their transition to the doctoral level. There are also 38 accredited OTM programs that have actively inquired about transitioning to the OTD level.

Over the last couple of months, it has come to ACOTE's attention that a great deal of inaccurate and misleading information has been circulating about the OTD entry-level decision. In an attempt to elucidate the facts and dispel the myths surrounding ACOTE's OTD Entry-level Degree Mandate, the following chronology of events has been prepared by ACOTE.

### **ACOTE Entry-level Degree Timeline**

Apr-1998	ACOTE adopted the position statement for the draft accreditation standards "given the demands, complexity, and the diversity of contemporary occupational therapy practice, ACOTE's position is that the forthcoming educational standards are most likely to be achieved in post-baccalaureate degree programs." This led to the representative assembly passing Resolution J "Movement to Required Post-Baccalaureate Level of Education" in April 1999.
Aug-1999	After an exhaustive evaluation of the short and long-term impact of the decision to move to post-baccalaureate degree entry, ACOTE voted at its August 1999 meeting that professional entry level occupational therapy programs must be offered at the post-baccalaureate level by January 1, 2007 to receive or maintain ACOTE accreditation.
Aug-2004	ACOTE voted to transition from accreditation of occupational therapy educational programs to accreditation of <b>occupational therapy degree levels</b> .
Feb-2011	The <b>AOTA Future of Occupational Therapy Education Ad Hoc Committee</b> was appointed by AOTA. Over 30 academic and practice leaders worked on the project.

- Feb-2013      The **AOTA Future of Occupational Therapy Education Ad Hoc Committee recommended the mandate for doctorate as the single point of entry for occupational therapists.**
- Apr-2013      ACOTE reviewed the AOTA Future of Occupational Therapy Education Ad Hoc Committee's report and recommendations. Council members held a discussion on the merits of the recommendation.
- Apr-2014      AOTA Board of Directors releases [position statement](#) that ***"the profession should take action to transition toward a doctoral-level single point of entry for occupational therapists, with a target date of 2025"***. The position statement was shared with ACOTE by the AOTA Board of Directors for consideration in establishing the entry-level standards. President Stoffel stated "this document reflects the boards view of the future of the profession. However, the board does not have authority to implement this [recommendation](#)."
- Existence of two entry-level degrees (master's and doctorate) as the requirement for candidacy to sit for a single certification exam is confusing to all stakeholders. A single entry-level degree clearly articulates the entry-level competencies and educational requirements to all stakeholders.
  - The increased requirements for practice-based scholarship and research in the doctoral accreditation standards result in an occupational therapist who is able to rigorously implement evidence-based practice, understands care delivery models, and is prepared to meet the future occupational needs of society.
  - Doctoral-level education will best prepare graduates who can demonstrate professional autonomy.
  - The increased focus on primary care, interprofessional care teams, and specialization in practice has required increased content in the entry-level academic programs (Institute of Medicine, 2010; Interprofessional Education Collaborative Expert Panel, 2011; National Committee for Quality Assurance, 2011; NQF, 2012).
  - The trend in health-related professions to transition to the entry-level doctorate has impacted hiring practices, salary differentials, and leadership appointments in a small number of medical academic centers.
  - The AOTA Future of Occupational Therapy Education Ad Hoc Committee's review of the profession's maturation (AOTA, 2013a) determined that the move to a single doctoral-entry-level degree will best position the profession to meet the growing needs of society and fulfill its potential in the 21st century.
- Apr-2014      At its spring meeting, ACOTE reviewed the AOTA Board of Directors position statement and revisited the AOTA Future of Occupational Therapy Education Ad Hoc Committee report. ACOTE appointed a Task Group on Entry-Level Degree requirement.

Aug-2014	At the summer meeting, the ACOTE Task Group submitted a plan for data collection from stakeholders for approval. ACOTE approved the Task Group's plan for data collection including the survey of stakeholders.
Oct-2014	The Academic Leadership Council-AFWC Forum joint meeting was attended by over 400 academic leaders who participated in open forums and debate on the entry-level degree position statement.
Dec-2014	At the fall meeting, ACOTE reviewed the (1) preliminary survey data; (2) proceedings from the Academic Leadership Council-AFWC Forum joint meeting and (3) selected articles from the literature. Council members identified that the majority of feedback came from OT/ OTA program faculty and noted the need for additional data from other stakeholder groups.
Apr-2015	ACOTE hosted roundtable discussions with targeted stakeholders at AOTA conference. In addition, targeted interviews were held with employers of OT graduates.
Apr-2015	At the spring meeting, ACOTE reviewed preliminary data from the round table discussions and conducted focused interviews.
Aug-2015	At the summer meeting, ACOTE invited four content experts for presentations and a Q&A session. Content experts included: (1) two academic leaders (one speaking for and one against the doctorate entry-level); (2) a health systems researcher; and (3) university provost and former medical school president. ACOTE reviewed data collected from stakeholders and a report of progress on the ACOTE Task Group. Members introduce three motions: (1) Motion for a single entry-level degree at the doctorate for occupational therapists. -DEFEATED. (2) Motion to move entry-level degree for the occupational therapy assistant to the bachelor's degree. – DEFEATED. (3) Motion to allow two points of entry for the occupational therapy assistant: associate and bachelor degrees. – ADOPTED.
Oct-2015	The AOTA-Academic Leadership Council Meeting open forum focused on feedback and discussion on the ACOTE action on two points of entry (associate and baccalaureate) for the occupational therapy assistant.
Dec-2015	At the fall meeting, ACOTE reviewed feedback received from stakeholders. The Council noted that the majority of feedback focused on the potential impact on the sustainability of the academic programs, resources, diversity recruitment and costs. The Council members noted that there was very little feedback on the impact of degree level on preparation for practice and addressing the needs of the recipients of OT services. ACOTE appointed a Task Group to review the potential impact on preparation of entry-level occupational therapy graduates to meet the changing demands of the health care delivery system.
Apr-2016	ACOTE hosted forums at the AOTA Annual Conference and Academic Leadership Council Meetings on the doctoral entry point issue.
Apr-2016	ACOTE members received updates on the debate at the spring meeting. Materials were made available with a decision to review in detail at the summer meeting in August.

- Aug-2016 At the summer meeting, ACOTE received additional reports, data, and information from the ACOTE Task Group. At the summer meeting, ACOTE reviewed the interim report from the ACOTE Task Group and the data collected since release of the AOTA Future of Education Ad Hoc report. During the discussion a Council member called the question and submitted a motion: Motion for a single entry-level degree at the doctorate for occupational therapists. -DEFEATED.
- Dec-2016 At the fall meeting, ACOTE received additional reports and reviewed summaries on the quality initiatives. An interim report from ACOTE Task Group was considered.
- Apr-2017 At the spring meeting, ACOTE received additional updates and articles to review. Discussion was held on the recommendations of the AOTA Ad Hoc Committee on Experiential Learning Requirements.
- Aug-2017 At the summer meeting, ACOTE received additional reports, data, and information from the ACOTE Task Group. The Council reviewed the cumulative information dating back to 2013 and during the discussion a Council member called the question and submitted a motion: **(1) Motion to mandate the doctoral entry level degree for occupational therapists. -ADOPTED.** A second Council member submitted a new motion: **(2) Motion to mandate the entry-level degree for the occupational therapy assistant be at the bachelor's degree. – ADOPTED.**
- Aug 21, 2017 The **AOTA Board of Directors released a [statement](#) to the profession supporting ACOTE's mandate decision:** *"This action comes after several years of dialogue within the community, careful study, and consideration of important trends affecting our profession and its future. The AOTA Board of Directors applaud the Council for the thoughtful approach they took to their deliberations to identify the optimal entry level of education for ethical, accountable, and efficient practice to meet society's occupational needs.".... "The Board of Directors recognizes the challenges faced in a constantly evolving academic and professional landscape. These challenges require a clear strategic vision that will enable our profession to lead rather than follow. It is incumbent upon us as leaders in the field to look out for the best interests of our members—students, graduates, faculty, and clinicians—as we navigate our profession's path forward. **We believe ACOTE has acted in the best interest of all of these parties with their recent decision.**"*
- Sept-2017 Related to the OTA degree levels, ACOTE received a significant volume of feedback related to the motion to mandate the entry-level degree at a time when there were not approved baccalaureate educational standards for the occupational therapy assistant be at the baccalaureate degree. In response, the Council voted to **hold the OTA entry-level degree mandate in abeyance** pending the opportunity to gain additional comments and feedback from stakeholder groups.
- Oct-2017 Open forums were conducted at the Academic Leadership Council meeting for feedback on the mandates.
- Oct-2017 The **AOTA Board of Directors [voted unanimously](#) to reaffirm support for the position statement of April 2014 that "the profession should take action to transition toward a doctoral-level single point of entry for occupational therapists."**

- Mar 12-2018 AOTA President released video stating that “AOTA’s Board wants you to know that we are listening to member concerns about ACOTE’s OTD and bachelor’s educational requirements.”
- Mar 21-2018 AOTA Board began a series of forums called the “National Conversation on the Future of the Profession”.
- April -2018 ACOTE hosted an open forum at 2018 AOTA Conference on the entry-level degree for the OTA.
- June-2018 The AOTA Board of Directors expressed disagreement with ACOTE decision to move forward with the OTD mandate—the very decision which the AOTA Board of Directors had approved and lauded six months earlier. AOTA has told ACOTE that the OTD mandate should be placed in abeyance while the AOTA Board of Directors further investigates the issue and that OTA mandate should also continue to be held in abeyance. ACOTE has also been told that the AOTA Board will require 1 year to investigate the issue.
- July-2018 AOTA President Lamb and the AOTA Executive Director requested the opportunity to attend a portion of ACOTE’s August meeting to present the arguments for their position that the OTD mandate should be held in abeyance. ACOTE has honored their request to address the Council on this matter.
- Aug-2018 ACOTE approved the 2017 Accreditation Council for Occupational Therapy Education Standards (effective July 31, 2020) for all degree levels (associate, bachelors, masters, and doctorate).
- ACOTE rescinded the mandate for the single point of entry for occupational therapy assistant education, allowing time to implement the new baccalaureate standards for the OTA and assess outcomes.
- ACOTE unanimously reaffirmed the August 2017 decision to move to a single point of entry for occupational therapy education at the doctorate level.

### **Conclusion**

Over the last four years, ACOTE has expended substantial manpower and financial resources to carefully study the merits and drawbacks of an OTD single point of entry and to ensure that the voices of all stakeholders were heard, clearly, and in multiple ways. Over this time, AOTA’s Board of Directors continually expressed support for and approval of the processes which ACOTE utilized as well as the ultimate decision to require OTD as the single point of entry.

ACOTE has acted in the best interest of all parties with our decision for a single point of entry for the occupational therapist and the dual point of entry for the occupational therapy assistant. ACOTE will continue to support educational programs to meet the growing needs of society and fulfil its potential in the 21<sup>st</sup> century. We look forward to working with educational programs to ensure quality occupational therapy education to support the preparation of competent occupational therapists and occupational therapy assistants.