

Tab 13

## St. Charles Community College Collaborative Comprehensive Review

Coordinating Board for Higher Education  
September 16, 2020

### BACKGROUND

The Coordinating Board for Higher Education discharges its responsibility for coordinating, reviewing, and approving proposed new degree programs by the authority given in [§§ 173.005](#) and [173.030, RSMo](#). The process for reviewing new degree program proposals is codified in administrative rule [6 CSR 10-4.010](#). *Submission of Academic Information, Data and New Programs*. While most programs are reviewed at the routine level (program meets requirements for mission, duplication, location, financial and institutional resources), the rule also provides an opportunity for institutions to propose programs outside of these parameters if certain qualifications are met, as part of the comprehensive review process.

For community colleges proposing to offer a bachelor's degree, the following additional criteria is required, as outlined in [§163.191\(1\), RSMo](#):

*Community college course offerings shall generally lead to the granting of certificates, diplomas, or associate degrees, and may include baccalaureate degrees only when authorized by the coordinating board for higher education in circumstances where the level of education required in a field for accreditation or licensure increases to the baccalaureate degree level or, in the case of applied bachelor's degrees, the level of education required for employment in a field increases to that level, and when doing so would not unnecessarily duplicate an existing program, collaboration with a university is not feasible or the approach is not a viable means of meeting the needs of students and employers, and the institution has the academic and financial capacity to offer the program in a high-quality manner.*

The review of proposals for Comprehensive Review is divided into two phases. In Phase I, institutions submit a proposal for consideration by the CBHE, which then decides whether to move forward with a full comprehensive review (Phase II). The CBHE, at its March 4, 2020 meeting, voted to move the SCC proposal to Phase II review. The Phase II proposal and supporting documentation [Attachments A-C] were posted for public comment for 20 working days, July 21, 2020, through August 18, 2020. A finalized MOU [Attachment D] was received on September 3, 2020 from St. Charles Community College and Missouri State University, at the request of the CBHE.

### CURRENT STATUS

An external review team [Attachment E] was established, as set forth in 6 CSR 10-4.010, to provide their expertise in reviewing the Phase II proposal submitted by SCC. The external review team consisted of 18 members from 11 institutions, comprised of two-year and four-year OT/OTA faculty and/or administrators, deans and directors of allied health programs, and chief academic officers, charged with reviewing the Phase II proposal and supporting documents according to the guidelines established in statute and codified in the administrative rule, and providing a written report and recommendation [Attachment F] to the CBHE. The team met five times between July 31 and August 28 to review the Phase II documents submitted by St. Charles Community College, the public comments received and SCC's response to the public comments, met electronically to review the updated MOU submitted by SCC on September 4, 2020, and provided an addendum to their initial report [Attachment G].

Public Comments Received

The public comment period for the Phase II proposal ended on August 18, 2020. Comments were received from Southeast Missouri State University [Attachment H] and University of Missouri-Columbia [Attachment I].

A brief summary of the comments received:

Criteria addressed in comments	Southeast Missouri State University Comment	University of Missouri Comment
Increased educational requirements for accreditation or licensure	The entry-level requirements have not changed to the bachelor's degree	Level of education required has not increased to the bachelor's level.
Increased level of education for employment	Proposal "does not convincingly demonstrate that employers are requiring a higher level of education."	Market analysis does not support that level of education for employment has increased.
Unnecessarily duplicate existing program	Since the OTA proposal was originally proposed, the University of MO-Columbia received approval from CBHE to offer the bachelor's degree in OTA. The proposal was not updated to address this issue.	University now has a bachelor's OTA program that will open for admission in August 2021. SCC documents have not been updated to reflect new programs or new ACOTE policy.
Collaboration with a university is not feasible	The proposed collaboration with Missouri State University is unclear.	Details regarding the collaboration with MSU are unclear.
Academic and financial capacity	"Documentation does not focus on the institution's ability to effectively offer and sustain the proposed program."	"...neither the Phase I nor the Phase II proposal provide 'a comprehensive cost/revenue analysis summarizing the actual costs for the program and information about how the institution intends to fund and sustain the program...'"

SCC responded [Attachments J-L] to the public comments by providing a copy of the degree plan and instructional responsibility document, as well as indicated additional information regarding tuition and fee structure would be made available as part of the updated MOU.

#### External Review Team Report

The External Review Team provided a written report and recommendation, and an addendum after reviewing all documents submitted by SCC. In summary, the team determined that the materials submitted by SCC did not meet, or did not fully meet, the criteria as stipulated in the statute and rule, and they did not recommend approval of the proposed program. The full report and addendum are attached for CBHE review [Attachments F-G]. SCC also provided response to the External Review Team's report, provided in Attachment N.

In light of the findings by the External Review Team, and after independent review by DHEWD staff [Attachment M], the following recommendation is made to the CBHE.

#### **RECOMMENDATION**

~~Staff recommend that the Coordinating Board not approve the Bachelor of Applied Science in Occupational Therapy Assistant program proposal submitted by St. Charles Community College (as a standalone program or in collaboration with Missouri State University). Staff recommend that the Coordinating Board direct staff to continue to work with St. Charles Community College and Missouri State University to identify~~

the information needed to complete the review, and to clarify the regulatory requirements with institutions associated with the comprehensive review process.

## **ATTACHMENTS**

- A. St. Charles Community College Phase II Proposal
- B. St. Charles Community College Market Analysis
- C. St. Charles Community College Degree Plan
- D. Updated Memorandum of Understanding
- E. External Review Team Membership
- F. External Review Team Report and Recommendation
- G. Addendum to External Review Team Report and Recommendation
- H. Public Comment from Southeast Missouri State University
- I. Public Comment from University of Missouri
- J. St. Charles Community College Response to Phase II Comments
- K. St. Charles Community College Degree Outline
- L. St. Charles Community College Instructional Responsibility
- M. DHEWD Statutory Criteria Review
- N. St. Charles Community College Response to External Review Team Report and Recommendation

**St. Charles Community College**

**Bachelor of Applied Science in Occupational Therapy Assistant**

**Preliminary Proposal**

**June 2019**

**St. Charles Community College**  
**Bachelor of Applied Science in Occupational Therapy Assistant**  
**Preliminary Proposal**

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June 27, 2019

Missouri Department of Higher Education  
205 Jefferson Street  
PO Box 1469  
Jefferson City, MO 65102-1469

To Whom it May Concern,

It is my pleasure to introduce this proposal from St. Charles Community College (SCC), which if approved, will allow our students, many of whom live in rural parts of our service area, the opportunity to pursue a bachelor's degree of applied science for Occupational Therapy Assistant.

It is common knowledge that in the early 90s, St. Petersburg Community College became the first community college to offer a bachelor's degree. The justification for expanding access was based on major gaps in the workforce and the need to provide additional education in certain areas such as healthcare and information technology. This need is still relevant today, with more than 23 states allowing community colleges to offer a bachelor's of science degree in critical workforce areas.

As we contemplated the potential success of expanding to a bachelor's program we looked to current research and found that according to the Education Policy Research Center at the University of Florida, "... three out of four students enrolled in community college bachelor's programs were from underserved populations." As such, it appears that these programs are providing an affordable alternative to obtaining additional education. Additionally, the research suggested, "Public four-year programs may actually benefit from the presence of a bachelor's program at the local community college." Florida saw a 25% increase in degrees where local community colleges offered the competing degree.

I consider the conferring of a bachelor's degree in OTA as a natural extension of the college's commitment to access to an affordable education, while at the same time responding to the workforce needs of our service area. SCC's current program serves the citizens of six counties, has an average pass rate of 100%, and an average graduate rate of 89% as compared to the national graduation rate of 40%.

As you will see in the letters of support included with this proposal, members of our healthcare community have high praise for the academic excellence of SCC's OTA program and there is a critical shortage for meeting workforce needs. Your support of this proposal allows us to help students throughout our service area obtain a bachelor's degree at a convenient location and affordable cost.

We have to believe that as long as student success is the focus of our work and that the open door philosophy remains critical to our mission, offering a bachelor's degree does not change our focus; rather, we will continue to be the last great hope for access to education and will still be all about community.

Thank you for your consideration of this proposal. Please contact me if you would like to further discuss the details.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara Kavalier".

Barbara Kavalier, Ph.D.  
President  
St. Charles Community College

## **Overview of Intent**

In response to recent Missouri legislation, increased accreditation standards, mounting healthcare and workforce demands, and growing student and employer needs, St. Charles Community College (SCC) investigated and considered the broad impact of offering a baccalaureate degree in Occupational Therapy Assistant (OTA).

In the subsequent proposal, SCC and the OTA program considered and addressed several educational, industry, and programmatic factors outlined in Missouri House Bill 758. Per this legislation, community colleges may expand their missions to offer bachelor's degrees when...

“...in the case of applied bachelor's degrees, the level of education required for employment in a field increases...”

The Accreditation Council for Occupational Therapy Education (ACOTE) developed new baccalaureate standards for 2018 to address increasing professional responsibilities and knowledge gaps in current associate-level OTA programs and practice.

“...doing so would not unnecessarily duplicate an existing program...”

At this time, no institution in the state of Missouri offers a baccalaureate degree in OTA.

“...collaboration with a university is not feasible or the approach is not a viable means of meeting the needs of students and employers...”

Collaboration with a four-year institution is not possible because upper-level coursework for a completion of bachelor's of OTA is unavailable and a bachelor's of OTA degree does not exist. Collaboration with a university who would be interested in developing a new bachelor's of OTA program will not meet the students' needs because new applications will not be reviewed by ACOTE for a minimum of three to five years. This timeline for new program review by ACOTE will not address industry or employers' immediate needs nor will it address workforce demand due to the extensive waitlist. The Department of Labor and Statistics states the field of OTA will grow 28% in the state of Missouri by 2025.

“...the institution has the academic and financial capacity to offer the program in a high-quality fashion.”

With full, 10-year accreditation granted by ACOTE, SCC's OTA Program has implemented a competency-based curriculum and other critical infrastructure necessary to meet baccalaureate requirements including faculty, fieldwork sites, physical program space allocation, and support staff.

The following documentation will provide compelling information in support of this mission expansion. The narrative demonstrates how St. Charles Community College has positioned itself for this expansion by hiring excellent and innovative faculty and staff, obtaining additional real estate and lab-space for student training, cultivating expertise on-site to design the program, and implementing an effective competency-based curriculum which provides essential infrastructure for the new OTA Bachelor's-level Standards. This proposal also demonstrates that St Charles Community College is in a unique position to be an early adopter of educating bachelors prepared OTA's, both in Missouri and in the national educational marketplace. The proposal also demonstrates how the OTA Program expansion would positively impact workplace preparedness for students and meet forecasted workplace demand, therefore an expansion of the SCC mission to offer a Bachelors of Applied Science in Occupational Therapy Assistant is merited.

**St. Charles Community College**  
**Bachelors of Applied Science in Occupational Therapy Assistant Narrative**

**Narrative Introduction**

St. Charles Community College (SCC) and the Occupational Therapy Assistant (OTA) Program are submitting a letter of intent to initiate the process for a comprehensive review of academic program proposals to the Missouri Department of Higher Education (MDHE) and the Coordinating Board of Higher Education (CBHE).

Historically, community colleges offer degrees and coursework that generally lead to the granting of certificates, diplomas, or associate degrees. The OTA program and SCC request the state broaden the mission to allow SCC to offer a bachelor's degree of applied science in Occupational Therapy Assistant due to changes in the academic standards of the profession, which were necessitated by a growing and evolving healthcare system.

St. Charles Community College considered and investigated several factors in the decision to request a broadening of the mission. These factors include the Accreditation Council for Occupational Therapy Education (ACOTE) new baccalaureate standards, the passing of legislation in Missouri which allows community colleges to offer a bachelor's degree for programs that meet a workforce need, the employment and educational landscape throughout the state of Missouri, the quality and preparedness of the OTA program at SCC to offer a bachelor's degree, the interest of students and community partners, and the feasibility of collaborating with other institutions to address the healthcare needs in the state of Missouri. The following narrative is a description of the analysis and points of consideration.

Certified Occupational Therapy Assistant (COTA) and Occupational Therapist (OTR) are two distinct practitioners within the profession of Occupational Therapy. Each of these distinct practitioners has a different set of educational standards, professional licensure, and certification requirements. Therefore, articulating from an OTA program to an OT program is not feasible as each is a separate and unique degree path.

## ACOTE Rationale – Baccalaureate Standards

ACOTE has independent authority to set standards for the profession's educational programs. This includes setting the entry-level degree for the occupational therapist and occupational therapy assistant.

AOTA's Representative Assembly (RA) convened an Ad Hoc Committee to do a feasibility study in 2015 regarding degree level for the OTA. The committee looked at the following areas:

1. Defining expectations of practice for an OTA in the next decade.
2. Growth in content to address changes in practice.
3. Impact of any changes in entry-level degree requirements for the occupational therapists (e.g., doctoral requirement) on occupational therapy assistant education and practice.
4. Readiness of host institutions to support a transition to the bachelor's requirement and the trend in community colleges to offer a limited number of bachelor's degrees.
5. Faculty workforce including occupational therapy assistants with post-baccalaureate degrees.
6. Impact of regulatory changes associated with the Affordable Care Act (ACA) and impact on reimbursement.
7. The potential impact of increased costs on key stakeholders (i.e. students, employers, etc.)
8. Requiring the entry-level degree to be at the doctoral level could push more potential students into occupational therapy assistant programs because of the increased costs of a doctoral versus masters-level program.

ACOTE developed and approved occupational therapy assistant baccalaureate-level Standards in August 2018. This provides OTA programs the ability to transition their programs to the baccalaureate level to address some of the knowledge gaps identified in the first three bullets above. They felt that it was the path to maintain and retain occupational therapy assistants' patency in the future healthcare workforce. ACOTE believes that providing the additional content will equip students with the skills needed to address the issues related to complex healthcare systems and complex patients.

After an extensive two-and-a-half year process, multiple surveys to the communities of interest, and several open hearings, ACOTE adopted new accreditation standards for baccalaureate-degree-level occupational therapy assistant programs, and associate-degree-level occupational therapy assistant programs. Programs will be required to comply with the new 2018 Standards by July 31, 2020.

This action came after ACOTE had carefully studied the issue and weighed the various community perspectives over the last three years. The Council recognized that the challenges faced in a constantly evolving academic and professional landscape require a clear strategic vision and that our profession must be prepared to adapt and change to meet these challenges.

Independent reviews of the practice environment and policy literature identified that the majority of health policy papers support the need for entry-level practitioners better prepared to practice and compete in a constantly changing health care delivery system.

At a meeting in April of 2019, a decision was made about dual points of entry for OT and OTA academic programs:

Following the conclusion of a robust and collaborative process with leaders and members of the American Occupational Therapy Association (AOTA), on April 4, 2019, AOTA's Representative Assembly determined that occupational therapists may enter the profession at the master's or doctorate level, while occupational therapy assistants may enter the profession at the associate or baccalaureate level. This is now the official policy of AOTA for entry into the occupational therapy profession.

The AOTA Representative Assembly (RA) is responsible for establishing professional standards and policies for AOTA and the profession, including the scope of the profession and professional practice and the degree requirement for entry into the profession, as provided in the AOTA Bylaws.

ACOTE is recognized by the U.S. Department of Education and the Council for Higher Education Accreditation (CHEA) as the programmatic accreditor for the profession of occupational therapy. ACOTE has complete autonomy in establishing accreditation and education standards to evaluate entry-level educational programs; developing and implementing policies, rules, and procedures for conducting accreditation reviews; and making accreditation decisions with respect to entry-level educational programs.

As the accrediting body for the profession and in light of the Assembly's April 4th determination, ACOTE will accept letters of intent for doctoral level, master's level, bachelor's level, and associate level educational programs effective immediately.

"The Application Review" states "ACOTE will accept and review a maximum of 6 Candidacy Applications during a given cycle. The acceptance of Candidacy Applications will be based on the receipt date of the Letter of Intent (if signed by the program director) or the date of notification that a program director has been hired. After the 6-program cap is reached, programs will be subject to the next available review cycle and planned student admission must be delayed accordingly. Please note that the initial accreditation process takes approximately 1 to 2 years to complete and the first class schedule may need to be adjusted to allow completion of the initial accreditation process prior to graduation."

Beginning with Candidacy Applications due in August 2020, ACOTE is requiring that a qualified program director must be hired full time and on-site 1 year prior to the submission of the Candidacy Application. A qualified academic fieldwork coordinator must be hired full-time and on-site 6 months prior to the submission of the Candidacy Application. At least 1 year prior to the submission date for the Candidacy Application, the program must notify the Accreditation Department ([accred@aota.org](mailto:accred@aota.org)) that a qualified program director has been hired full-time in order to proceed with the initial accreditation process. Otherwise, the Candidacy Application submission slot will be made available to the first program on the waiting list or to the next Applicant program with a hired qualified program director." The next available opportunity to apply for candidacy and to participate in the review cycle for new programs is 2023.

### **SCC Conclusion – ACOTE Rationale**

While associate-degree-level programs for OTA have the option to remain an associate degree or transition to a bachelor's degree, SCC believes it is our responsibility to begin the transition to a baccalaureate degree as soon as possible to best serve the needs of our community. SCC is accredited by ACOTE and therefore will not be subject to the "new candidacy" timeline—SCC can apply immediately.

OTA faculty and SCC administration have focused strategic vision and aligned curriculum to address vital aspects of our program's mission to provide "...opportunities for academic excellence and student success to enable attainment of personal and professional goals in a global society." In alignment with the college's mission to respond to community needs, SCC's OTA program continues to strengthen curriculum in order to meet the changes in a dynamic health care environment. The baccalaureate standards put forth by ACOTE will guide the program in addressing the potential "**knowledge gap**" areas for the future OTA practitioners in the state of Missouri to best serve the evolving health care needs in our community.

## **Missouri Legislation**

The Missouri Legislature passed legislation in 2018 to allow community colleges to expand their mission to offer bachelor's degrees "where the level of education required in a field for accreditation or licensure increases to the baccalaureate degree level or, in the case of applied bachelor's degrees, the level of education required for employment in a field increases to that level, and when doing so would not unnecessarily duplicate an existing program, collaboration with a university is not feasible or the approach is not a viable means of meeting the needs of students and employers, and the institution has the academic and financial capacity to offer the program in a high-quality manner. Quality for such baccalaureate degree programs shall be evaluated at least in part by the delivery of upper-level coursework or competencies, and defined by accreditation or compliance with the Higher Learning Commission (HLC) standards for bachelor's degrees."

### **SCC Conclusion – Missouri Legislation**

The passing of this legislation indicates that Missouri Legislature recognizes the need for additional academic offerings. Students and the citizens of the state of Missouri will be beneficiaries of this legislation because they will receive the knowledge and training they need to meet growing workforce demands. SCC and the OTA program would like to expand their mission to offer a baccalaureate degree to provide opportunities for academic excellence and student success throughout our service area.

Students who become future OTA practitioners in the state of Missouri will best serve the evolving health care needs in our region with the additional education a bachelor's of OTA degree will provide. Many legislative and educational bodies recognize that rural counties are among the fastest-growing groups and account for a growing portion of the state's population, including working adults, low-income, and first-generation students who are all in need of additional quality education and essential job skills to meet workforce needs. The service area of SCC encompasses several of these rural counties and vulnerable communities.

## **Market Analysis/Feasibility Study**

### **Employment and Educational Landscape**

After contacting the Missouri Department of Higher Education to determine the feasibility of an application to expand the Academic Program, SCC chose to pursue a summary review of internal practices and a snapshot study of the Missouri OTA Marketplace from both an educator's and industry specialist's perspective.

### **Marketplace Study Objective**

SCC commissioned River Henge Partners LLC to perform a Missouri Marketplace Study to provide data relative to the Occupational Therapy Assistant ("OTA") workforce qualifications for graduate placement within the state of Missouri. The "OTA Missouri Marketplace Engagement Data Study" ("Data Study") was designed to capture data on positions marketed upon exit of educational institution and employer's qualifications to confirm additional skills-sets or professional-level requirements.

### **Third-Party Review and Reporting**

Separately, River Henge Partners LLC, a business-consulting firm specializing in industry-sector data analytics, was commissioned to provide Summary Reporting of the external Study findings. River Henge Partners is a private sector catalyst rooted in data research, analytics, and hands-on experience to guide master-planned economic development. With a combined 30 years of experience in economic development - including urban and rural planning and another 20 years in data research and analysis, River Henge Partners offers customized data for communities and industries in any economic and industry sector.

### **Considerations of the Study**

#### ***Geographic Boundaries***

Reporting criteria is limited to the state of Missouri for education and industry defined marketplaces. Since both the OTA Educational Program requirements and the Professional OTA certification are national, consideration accounts for prevailing industry standards.

#### ***Job Title Specificity***

OTA's are referred to as COTA's in the workforce. This title points to the passage of the National Board for Certification in Occupational Therapy (NBCOT) Board Certified Exam, which OTA's must pass to practice within their profession and license as per Missouri state requirements.

#### ***Marketplace Engagement***

The data gathered reached into the State of Missouri's educational environment, active labor market, and collected job descriptions and positions, which posed an industry standard. The Study process engaged both educators who have direct responsibility in transitioning students to the workforce and industry experts (department heads, therapy managers, talent acquisition) who work daily with OTAs in their respective work environments. The direct marketplace engagement provides a snapshot of what is happening within the industry today from a workplace and education/workforce training perspective.

#### ***Meeting Educational Challenges***

AOTA maintains that Innovation within Higher Education is "Alternate delivery models that increase accessibility and decrease costs." This includes competency-based degrees such as the OTA degree program. There is a shift in OT education that changes the entry-points for students seeking certification. ACOTE has mandated that there will be dual points of entry for the occupational therapist namely masters and doctoral level by July 1, 2027.

The educational gap created between the supervising OT and the OTA explains one of the rationales for ACOTE to introduce a bachelor's degree point of entry to OTA professional certification. The move in profession to a bachelor's requirement underscores the knowledgebase-need Missouri's industry professionals already are experiencing.

Two key observations from the Study include:

1. The required education, field work experience and training is entirely Industry driven
2. Industry is pushing for additional education and experience to provide a base to increase OTA responsibility and to bridge the knowledge base divide between OT's and OTAs.

SCC College states the OTA Program is uniquely aligned and positioned to provide enhanced professional entry-level requirements for a Baccalaureate Degree of Occupational Therapy Assistant in addition to offering an updated curriculum for their current Associate of Applied Science Degree (A.A.S) that is competency based and informed by workforce needs.

### **Workplace Feedback**

#### ***Education Survey- Salient Points***

Of forty-three (43) higher education schools offering degrees and programming that reach throughout Missouri's Occupational Therapy Spectrum, there are sixteen (16) colleges, universities and technical schools that are focused on OTA programming. However, within the sixteen (16), there are only nine (9) unique active OTA programs accredited through ACOTE, of which two (2) are private schools. A Consortium of schools accounts for one (1) unique active program but represents seven (7) advertised programs. Three (3) of the nine (9) unique OTA programs are in the St. Louis Region, including St. Charles Community College.

#### ***Industry Survey – Salient Points***

During the Study, the data research firm found ninety (90) active job listings referencing keywords "OTA," "COTA", and "Occupational Therapy Assistants". Forty-one (41) companies posted listings including health systems, home health, skilled nursing, acute and inpatient care, medical spas, rehabilitation centers, psychiatric centers and Professional Management companies. Twenty-one (21) companies were selected to provide job position sampling and marketplace feedback. Twelve (12) confirmed OT use as part of their healthcare protocol. Eight (8) companies responded with contextual feedback.

### ***Marketplace***

According to the "2018 Current Trends in accreditation and Higher Education" presentation by AOTA on April 19, 2018, the US Bureau of Labor Statistics indicates that Occupational Therapy Assistants is the 15th fastest growing occupation in the US, with predicted Job Growth from 2016-2026 equaling >28%. The results of the OTA Missouri Marketplace Engagement Study supports a rapid progression of industry adoption. The Study results suggested the two industries within healthcare experiencing the most opportunity for COTA placement are the skilled nursing and home health industries. Furthermore, interview respondents indicated that there are multiple driving factors. These include change in regulations, which expanded responsibilities of the OTA, shift in direct patient care by the OT into a purely administrative and oversight role leaving the OTA in an even more essential position as the primary patient care provider, and shift in insurance billing (PTPM) which affects the billed time and company reimbursement processes.

### ***Industry Outliers***

For the study, researchers did gather subjective examples of non-traditional OTA job positions, which were subject to the opinion of the author. Formal Study search parameters did not specifically meter non-traditional job titles, unless otherwise inclusive of with COTA qualification within the definition or job search, as those bleed outside the spectrum of verifiable COTA-qualified job positions. Industry respondents were all within the health-care field. Educators indicated they are seeing expanded interest from corporate and non-traditional workplaces seeking an OTA knowledge base as a key member of their staff. Examples for this are ergonomic specialists, wellness coaching, program design and chronic disease support foundations.

### ***Analysis***

1. The education, field work experience, and training required is entirely Industry driven
2. Typical entry-level employment is in a clinical setting, which is considered “traditional” in the health-care field
3. Industries include hospitals, clinics, mental health, pediatrics, acute-care and skilled nursing
4. Some industry outliers exist - school districts (still a traditional placement), private- based placements that are entrepreneurial (i.e. adaptive martial arts; therapeutic horseback riding, tele-health and wellness/job coaches)
5. The role of the OTA throughout the health-care industry is changing
6. Industry expectation of OTA performance breech typical curriculum-based training and include professional communication, time management, stress management, administrative and reporting responsibilities and a certain amount of physicality to perform tasks on the floor and in the field.

### ***Study Outcomes***

1. Both educators and industry specialists have seen a shift in responsibility to the OTA for direct patient care
2. According to industry experts commenting during marketplace engagement, the role of an OTA in the health-care field will be more critical as their responsibilities increase and as insurance reimbursement and billing regulations come online.
3. Educators maintain that the demand is outstripping placement and as awareness of OTA skill-sets increase, more corporate and private emerging fields will open.
4. Industry is pushing for additional education and experience to provide a base to increase OTA responsibility and to bridge the knowledge base divide between OT's and OTA's.

## Narrative Conclusion

Occupational Therapy helps people across the lifespan to do the things they want and need to do through the therapeutic use of everyday activities (occupations). Practitioners are tasked to enable people of all ages to live life to its fullest by helping them promote health, and prevent—or live better with—injury, illness, or disability.

Occupational Therapy Assistants are licensed, certified, professional health care providers who play a vital role in patient well-being by providing direct patient care, instructional training, and human interaction. According to the industries represented in Marketplace Engagement, OTAs represent a critical link in patient recovery and wellness.

The expected amount of education, fieldwork, and experience prior to the OTA entering the workforce is expanding to meet the roles and responsibilities within the healthcare field and respective industries. Per the recommendation of the nationally accrediting body, the spectrum of education provided as an entry-point into the field is shifting to match market demand and the realistic functional role of the professional.

Outside of the healthcare industry, the role of the OTA is changing. As corporate awareness about the Occupational Therapy and the skillset of a qualified COTA grows, emerging fields will follow. This introduces new markets, creates competition for an OTA outside of their current respective certified fields, and places new relevance on the healthcare fields' demand for increased knowledgebase and fieldwork experience.

According to the 2018 MO Economic Report, conducted by the Missouri Department of Economic Development, The Health Care and Social Assistance industry sector is the number one employer in Missouri. Market trends indicate the Healthcare and Social Services industry is growing. Health Care and Business / Management related jobs are the most in demand occupations within the state.

SCC currently offers an Associate of Applied Science in OTA. There exists the faculty interest and expertise to expand to include an OTA Bachelor's Degree program. This interest aligns with newly released recommendations for professional educational standards.

The College has positioned for this expansion by the staffing, real estate and lab-space for student training. The expertise is already on-site to design the program. This affords the College a unique position as an early adopter, in both Missouri and the national educational marketplace.

If successful in receiving MDHE and CBHE approval for expansion, the defined opportunities for the student and institution are: 1) student educational attainment, 2) workforce need, 3) community engagement, 4) program innovation, and 5) affordability for the student. The proposed OTA Program expansion positively influences workplace preparedness and meets forecasted marketplace demand and an expansion of the SCC mission to offer a Bachelors of Applied Science in Occupational Therapy Assistant is warranted.

**St. Charles Community College**  
**Occupational Therapy Assistant Program Analysis**

**Program Mission**

The current mission of the Occupational Therapy Assistant (OTA) Program is to “provide opportunities for academic excellence and student success to enable attainment of personal and professional goals in a global society.” We consider the American Occupational Therapy Association’s (AOTA) Vision 2025 of providing culturally responsive and customized care to maximize the quality of life for all people and the academic standards developed by the Accreditation Council of Occupational Therapy Education (ACOTE) as guiding principles. The OTA Program provides its students with the opportunity to acquire the knowledge, skills, behaviors, and attitudes necessary for ethical, competent, and reflective practice to fulfill their growing professional roles. In keeping with these missions, the OTA program strives to meet the dynamic health care needs of our local communities. The OTA program seeks to further implement its mission by providing the following in a bachelor’s of applied science degree at our institution:

- The highest quality instruction and practice to its students using evidence-based innovative instructional methods and technology that is accessible and financially affordable.
- A solid foundation in the fundamental knowledge, skills, and attitudes needed for the growing demands of bachelors prepared entry-level competence as an occupational therapy practitioner in a variety of settings and working with a variety of populations.
- A consistent commitment to strategically focus on the scholarship of teaching and learning and the scholarship of application for both faculty and students to support research and foster innovation to benefit the community.
- A comprehensive competency focused curriculum that integrates studies in science, math, humanities, communication, social sciences, and critical thinking.
- Experiences emphasizing the need for lifelong learning, keeping up with the dynamic nature of healthcare, and the importance of evidence-based practice as essential components of competent bachelor level practitioners who can meet evolving workforce demands.

## **Program Philosophy**

Consistent with the profession's philosophical base, the OTA program at St. Charles Community College (SCC) acknowledges individuals as complex, active beings who "have an innate need and right to engage in meaningful occupations throughout their lives. Participation in these occupations influences their development, health, and well-being" (Gupta et al., 2011). Engagement in occupation is complex and multidimensional; various integrated factors contribute to the quality of participation, including client factors, performance skills, performance patterns, contexts, and environments as well as understanding the activity demands. (AOTA, 2014). The delivery of occupational therapy services is client-centered, with practitioners using clinical reasoning, the therapeutic relationship, and a code of ethics to support clients' goals; the occupational therapy practitioner seeks to "maximizes health, well-being, and quality of life for all people, populations, and communities through effective solutions that facilitate participation in everyday living." (AOTA, Vision 2025).

Students in the OTA Program are regarded as occupational beings; as such, they learn and grow through participation in meaningful occupation in the role of an OTA student. Therefore, the OTA program is student-centered to foster success by developing students' skills through planning the curricular demands providing a positive learning environment that mirrors the changing healthcare and community environment. The program seeks to integrate and balance the students' abilities, needs, occupational roles and contexts in developing the skills needed to perform the roles of a direct service provider, member of a profession, and educator/facilitator/manager of service. This process is facilitated by the application of self-directed learning and key components of Knowles adult learning theories. "Instruction should facilitate self-direction, in a relevant context, take into account the wide range of different backgrounds of learners; materials and activities should allow for different levels/types of previous experience, and should allow learners to discover things and knowledge for themselves." (Manning, 2007, p 104).

The OTA Program respects students as adult learners and supports their growth through a multifaceted approach in the curriculum design. Teaching approaches use didactic instruction, experiential learning, professional collaboration, community engagement, technology, and cultivation of clinical reasoning. Faculty facilitate the development of role competencies. The curriculum is grounded in this philosophy and is based on the programs graduate outcomes.

The faculty work closely with students to provide clear instructional guidance to meet professional standards as well as apply flexibility in instructional approaches with a focus on teaching, learning, and application of skills to ensure student success. Faculty recognize the need to expand the use of technology and foster innovation to provide learning experiences that facilitate competence in an increasingly evolving healthcare system, which demands value and client-driven outcomes across care settings. The OTA Program empowers students to competently and confidently demonstrate the role of direct service provider; member of a profession; and educator, facilitator, and manager to the best of their abilities.

## **Curriculum Design**

The OTA program reflects the mission and values of the college in its belief that learning is a lifelong process that continues beyond formal academic training and fieldwork experiences. The program envisions a model that focuses on three primary roles—direct service provider of care, educator and manager of health care services, and members of a profession. The OTA Program uses three methods of learning (Theory, Practice, Application in Context) that the OTA practitioner assumes in order to bridge the gap between theory and practice to successfully fulfill the expectations of OT practice.

The use of these three roles and methods in conjunction with the OT Practice Framework, Standards of Practice for Occupational Therapy, AOTA Fieldwork Evaluation, ACOTE standards, and Knowles' Principles of Androgyny serve as organizing framework in determining and facilitating the knowledge, skills, or attitudes necessary to establish entry-level competency for the OTA practitioner. The following outcomes provide a guide for the knowledge, skills, and attitudes needed to engage in each role of the OTA:

1. Demonstrate the knowledge, skills, and attitudes to successfully fulfill the demands of each role.
2. Consistently engage in effective communication and interpersonal skills.
3. Establish appropriate teaching-learning competencies that apply to diverse audiences
4. Demonstrate the ability to serve as an advocate for various populations, facilities, communities, institutions, and the profession of Occupational Therapy.
5. Demonstrate the ability to effectively collaborate with an interdisciplinary team.
6. Demonstrate a broad scope of knowledge of the ethical, legal, regulatory, and professional codes that inform the practice of Occupational Therapy.
7. Develop the ability to apply and use technology and resources to support evidence-based practice.

In designing and assessing learning and teaching strategies, the parallel between therapy and education is emphasized. Just as client treatment is a multi-sensory process that requires active participation from the client engaged in meaningful activities, OTA education at SCC is a multi-sensory process requiring active participation and self-direction from the student engaged in the meaningful activities of their education.

The curriculum is designed to be delivered in a semester format of didactic work combined with a variety of Level I fieldwork experiences and two (2) Level II experiences in addition to a Baccalaureate Project to complete the program.

The Baccalaureate Project is designed to provide an in-depth experience in one or more of the following:

1. Clinical practice skills
2. Administration
3. Leadership
4. Advocacy
5. Education

This project allows students to demonstrate the application of knowledge gained that distinguishes them as bachelors prepared practitioners who will meet the growing demands of the workforce.

**SCC and Missouri Department of Higher Education**  
**"Preparing Missourians to Succeed: A Blueprint for Higher Education"**

SCC's OTA Program developed methods to attain the goals outlined by the Missouri Department of Higher Education's (MDHE) "Preparing Missourians to Succeed: A Blueprint for Higher Education." Those methods are described below.

**Goal 1: Attainment**

"Missouri will increase the proportion of working-age adults with high quality, affordable postsecondary credentials to 60 percent by 2025."

According to the Stronger MO through Higher Education Report, "The data shows that increasing attainment is a particular challenge in rural counties, so ensuring that all communities have access to high-quality higher education is essential. Missouri must also increase college success among the fast-growing groups that will account for a growing proportion of the state's population, including working adults, low-income and first-generation students, and students of color. Meeting the educational needs of these 21st-century students will help build Missouri's economy and ensure a bright future for the state." The goal is to increase the attainment of a college degree for Missourians to 60% by 2025.

St. Charles Community College serves the following counties in MO with the percentage of Missouri adults (ages 25-64) with at least an associate degree:

- St. Charles - 46.92%
- Callaway - 30.84%
- Lincoln - 21.70%
- Montgomery - 22.20%
- Pike - 18.16%
- Warren - 25.76%

SCC will be able to provide accessible, affordable, and high quality higher education to several vulnerable populations in MO and systematically increases attainment to close achievement gaps.

Experts from the Center on Education and the Workforce at Georgetown University said that, by 2018, 523,000 of the expected 898,000 job vacancies in Missouri would require postsecondary credentials. Indeed, 59 percent of all Missouri jobs require postsecondary education in 2018.

With increased expectations in the field of Occupational Therapy and increased expectations of autonomy and advanced skill demonstration, a bachelor's degree of OTA will provide the current, future, and potentially former graduates of SCC's OTA Program an affordable, accessible, and high quality bachelor's degree to meet growing professional and workforce demands.

Having a competency-based curriculum and a baccalaureate project that is designed to enhance vital skills for employment and addresses the needs, styles, and ability, of a multitude of learners, will allow working-age adults in the above counties, the state of Missouri, and beyond an opportunity to attain a quality and impactful post-secondary degree.

## **Goal 2: Affordability**

"Missouri will rank among the 10 most affordable states in which to obtain a postsecondary degree or certificate by 2025."

The average college debt among student loan borrowers in America is \$32,731, according to the Federal Reserve. This is an increase of approximately 20% from 2015-2016. Most borrowers have between \$25,000 and \$50,000 outstanding in student loan debt. Nevertheless, more than 600,000 borrowers in the country are over \$200,000 in student debt, and that number may continue to increase.

Missouri currently ranks 32nd nationally with 58% of Missourians having an average of \$27,108 in student loan debt. The average student loan debt of an SCC-OTA program graduate is \$2000.

In comparison, the following estimates outline the cost of a bachelor's-level degree (or 120 credit hours) at regional institutions.

<b>St. Charles Community College</b>	<b>\$21,240.00</b>
Maryville University*	\$113,880.00
Saint Louis University*	\$181,696.00
University of Missouri	\$51,687.00
University of Missouri – St. Louis	\$44,856.00
Washington University*	\$209,520.00

\* Denotes schools currently offering pre-Occupational Therapy baccalaureate education. As noted, no bachelor's-level OTA programs exist.

Students obtaining a Bachelor's of Applied Science in OTA from SCC would graduate with less student loan debt in comparison to four-year institutions. As of the submission of this proposal, no Bachelors of OTA programs exist in the state of Missouri. The next available opportunity for new programs to apply for candidacy and participate in the review cycle is 2023.

Considering the distinction between the professions and educational standards, articulation from OTA to OT is impossible. OTA graduates interested in pursuing an OT degree would need to complete a bachelor's degree and then apply to a master's program. Each degree prepares students for drastically different professional distinctions.

### **Goal 3: Quality**

"Missouri will produce graduates with high-quality postsecondary degrees and certificates that are valuable and relevant to individuals, employers, communities, and the state."

Consistent with the college's mission for providing opportunities for academic excellence and student success to enable attainment of personal and professional goals in a global society, the OTA program provides its students with the opportunity to acquire the knowledge, skills, behaviors, and attitudes necessary for ethical, competent, and reflective practice to fulfill their professional roles. In keeping with the college's mission to respond to the community, the OTA program strives to meet the dynamic health care needs of our communities. The OTA program seeks to implement its mission by providing:

- the highest quality instruction and practice to its students using evidence-based innovative instructional methods and technology that is accessible and financially affordable;
- a solid foundation in the fundamental knowledge, skills, and attitudes needed for the growing demands of bachelors prepared entry-level competence as an occupational therapy practitioner in a variety of settings and working with a variety of populations;
- a consistent commitment to strategically focus on the scholarship of teaching and learning and the scholarship of application for both faculty and students to support research and foster innovation to benefit the community;
- a comprehensive competency focused curriculum that integrates studies in science, math, humanities, communication, social sciences, and critical thinking; and
- experiences emphasizing the need for lifelong learning, keeping up with the dynamic nature of healthcare, and the importance of evidence-based practice as essential components of competent bachelor level practitioners who can meet evolving workforce demands.

SCC's OTA program is ACOTE accredited with a 10-year term before a review. According to ACOTE, 10-year review cycles are granted to programs that have no areas of noncompliance and have demonstrated exceptional educational quality. As outlined below, SCC graduates excel on the National Board for Certification in Occupational Therapy (NBCOT).

- The average pass rate nationally is 91%.
- The average pass rate for Missouri OTA programs over a three-year period is 87.31%.
- The average pass rate for SCC's OTA program over a three-year period is 100%.

According to the MDHE's "Enhanced Missouri Student Achievement Study":

- The average graduation rate from 2-year, public institutions in the state of Missouri is a 19.46% (over a three-year period).
- The national average is roughly 40%.
- The average graduation rate from SCC's OTA program is 89%.

Based on SCC-graduate surveys, 94% of students graduating from the OTA program are employed in their field within six months of graduation and board certification. Employer and student surveys show 95-100% satisfaction with program learning, employment status, and demonstration of work performance.

ACOTE standards for faculty numbers and composition for bachelor-level OTA programs must have at least three full-time faculty, 50% of whom must hold a minimum of a master's degree. SCC currently has four full-time and two adjunct faculty. Among the full-time faculty, 50% hold a minimum of a master's degree. The faculty at SCC possess a wide clinical and academic background and have been approved by ACOTE.

#### **Goal #4: Research and Innovation**

"Missouri will be a top 10 state for investment in academic research by 2025."

According to "Preparing Missourians to Succeed: A Blueprint for Higher Education," Missouri currently ranks as 10th in business-led research investment. Unfortunately, Missouri ranks 18th in academic-led research investment. SCC can invest in academic research. The creation of a Bachelor in Occupational Therapy Assistant will result in a new degree program that includes student participation in academic research as a standard for accreditation.

ACOTE provides accreditation standards for academic programs who educate and train Occupational Therapy practitioners. Occupational Therapy practitioners consist of two distinctions, Occupational Therapists (OT) and Occupational Therapy Assistants (OTA). The standards for the Bachelor of OTA have an increased emphasis on research, development, and quality to address the growing need for autonomous and entrepreneurially minded practitioners.

Providing a bachelor degree program in OTA will increase research at state institutions. ACOTE developed additional baccalaureate project standards and enhanced curricular standards, which require graduates of a Bachelor of OTA program to understand the use of quantitative and qualitative methods for data analysis, demonstrate an understanding of instructional design methods for preparing to work in an academic setting, and to develop skills for supervision, management, quality assurance, and improvement for program development. These standards are designed to address the growing need for additional educational content to meet the demands of the dynamic and evolving job market.

The faculty of St Charles Community College designed and implemented an integrated and progressive faculty-led fieldwork program to facilitate the success of students throughout the competency-based learning curriculum. Faculty and students will be able to utilize this model to do new academic research. The faculty currently supervise OTA students during level II fieldwork at three community-based sites. These sites provide a unique opportunity where the student in the OTA baccalaureate program could actively engage in and contribute to components of research, quality improvement, and program development while completing their fieldwork. In keeping with the AOTA's Vision 2025, these community sites are with underserved populations including pediatrics, geriatrics, and mental health. The American Occupational Therapy Association has the vision to guide the profession beyond the Centennial Vision. Vision 2025 states: "As an inclusive profession, occupational therapy maximizes health, well-being, and quality of life for all people, populations, and communities through effective solutions that facilitate participation in everyday living." The research that would be generated could be used to create or enhance solutions for these populations who are living, working, and engaging in our communities.

### **Goal #5 Investment, Advocacy & Partnerships**

"Missouri will promote increased investment in post-secondary education through increased advocacy and powerful partnerships with education, business, government, and communities."

St. Charles Community College OTA program has clinical contracts with a variety of clinical, non-clinical, and community-based organizations. These settings allow students to participate in clinical partnerships and practice in both traditional and emerging areas of practice. Embedded in our curriculum are also faculty-led fieldwork opportunities where students and faculty work with community partners to develop and enhance their current offerings and to provide students with progressive participation as they develop competency skills. Both Level I and Level II Faculty-Led Fieldwork rotations are available at an Adult Dementia Specific Day Program, Community Mental Health Day Program, and at a Child Development Center (ages 3 months-5 years).

Our fieldwork experience has been very positive overall with students participating in community sites. The benefit to the community and the benefit to the student's academic preparedness and job readiness is undeniable. However, one of the barriers in many emerging areas of practice is that some employment opportunities in the community require a Bachelor's degree. The educational needs to participate in program development, supervision, quality assurance, and quality improvement, etc. require additional baccalaureate content.

ACOTE developed a set of baccalaureate project standards to address the growing educational demands of the profession and to encourage the development of community and industry partnerships to meet the educational needs of the students and enhance workforce demands.

The Baccalaureate Project is designed to provide an in-depth experience in one or more of the following: 1) Clinical practice skills, Administration, 2) Leadership, 3) Advocacy 4) Education. This project allows the students to demonstrate the application of knowledge gained that distinguishes them as bachelors prepared practitioner who can meet the growing demands of the workforce.

"Level II fieldwork in the emerging practice fields of wellness and community health (WCH) stands out as a natural means to accomplish this goal; embedding a wellness and prevention service component into traditional fieldwork settings could also provide students with experience and in-demand skills. It is well known that students are often offered therapy positions at sites where they have completed traditional fieldwork (Rodger et al., 2007). In nontraditional fieldwork settings, some occupational therapy positions have been created in response to sites' experiences with occupational therapy students in fieldwork and service learning opportunities (Muñoz, Provident, & Hansen, 2004). The development of prevention-focused fieldwork could be a win-win approach. The students who have this experience will gain new knowledge and perspectives that are relevant to practice regardless of the setting. Additionally, the sites in which they work would become more aware of what occupational therapy has to offer and how it benefits their current services. As fieldwork introduces each incoming class of therapists to practice, there should be increased availability of occupational therapy positions in WCH services."

There are endless opportunities to collaborate with education, business, government and community entities. Offering a bachelor's degree would yield additional partnerships and allow SCC's OTA students to enhance their contribution to the community through Baccalaureate Projects. This is in direct correlation with Vision 2025: "As an inclusive profession, occupational therapy maximizes health, well-being, and quality of life for all people, populations, and communities through effective solutions that facilitate participation in everyday living."

### **Resources, faculty, staff, and space allocations in support of Bachelor's Degree Program**

Despite statewide budget restrictions, the Dean of Nursing and Allied Health along with the administration of St. Charles Community College are good financial stewards and consistent advocates for the OTA program. The OTA budget was expanded this year to address several needs including additional faculty to accommodate curriculum updates, changes, and course development. Additional funding was also granted for professional development, innovation and technology, and supplies for curriculum adjustments.

SCC purchased the building at # 1 Academy Place Dardenne Prairie, MO 63368 in February 2017. After the purchase, administration provided the OTA department with increased lab space including a simulated lab for OTA. As a result of the need for growth and potential to expand the OTA program, the following shared spaces for allied health students were developed: computer lab, simulated central supply, and competency skills practice rooms. Semi-private faculty office space was also added to accommodate the increase in OTA faculty. The program director has a private office, and there are multiple private areas for counseling students when needed.

The OTA program now has four full-time and two (core) adjunct faculty to accommodate changes to the curriculum and projected growth of an additional student cohort. Faculty have varying and diverse content specialties. The Program Director has been working with and mentoring all faculty on curriculum development, course design, and content implementation. Additionally, one of our administrative assistants has been reclassified and has been given the opportunity for professional development in the areas of clinical records and data collection. We also have allied health counselors on-site to facilitate student enrollment, retention, and student success through an embedded advising model. All of these additions have allowed the OTA department to grow and develop in accordance with our strategic plan and college mission and philosophy and position our program well to develop and implement bachelor's level curriculum.

### **Student Interest and Community Support**

St Charles Community surveyed former graduates of the OTA program and asked if a bachelor's degree was offered at the time they enrolled, would they have sought a bachelor's degree. 100% of the respondents replied strongly agree on a Likert scale of strongly disagree to strongly agree. 92% of the respondents replied strongly agree that they would enroll in a post-professional or bachelor's completion option for students who already graduated from SCC.

St. Charles Community College and the OTA program reached out to community partners and received multiple letters of support from fieldwork partners, industry leaders, administrators, constituents, higher education personnel, and public officials. Both SCC and the OTA program have diligently worked to build and maintain an excellent reputation in the community and validated in these responses. The support and interest in SCC pursuing a bachelor's degree in OTA speaks to the community interest, need, and confidence in the program.

### **Feasibility of working with other institutions and the process of seeking accreditation**

Occupational therapy practitioners are either occupational therapists or occupational therapy assistants. Both distinctions are skilled health care professionals who use research and scientific evidence to ensure their interventions are effective. Because there are two distinct roles within the profession, which have separate and distinct educational outcomes, licensure standards, and certification requirements. Collaboration with other institutions to bridge from OTA to an OT is unavailable. Occupational Therapy is in a unique professional and educational situation in that collaboration is neither feasible nor a viable means of meeting the needs of students and employers.

Institutions of higher education in the state of Missouri currently offer curriculum for OT, at either masters or doctoral level, or OTA at the associate-level. When asked, public universities were unwilling to provide documentation citing a lack of bachelor-level OTA coursework. The absence of upper-level, ACOTE-approved OTA coursework precludes institutions from offering a bachelor-level degree in OTA. At this time, universities in the state of Missouri are ineligible to offer a Bachelor's in Applied Science for OTA; the next availability for new program review is 2023. St. Charles Community College has demonstrated its readiness to become the first institution to offer this unique degree path.

An occupational therapy assistant program seeking accreditation for a new entry-level degree program should first seek approval to offer a baccalaureate degree from the institution, the educational licensing and/or governing board(s) of the state(s) in which the program is to be offered, and the institutional accrediting body. The program does not need to have degree-granting authority at the time of the Letter of Intent but must have that authority at the time the Candidacy Application is submitted. No fees are required and there is no cap on submission of Candidacy Applications for currently accredited programs transitioning from the associate-degree level programs to the baccalaureate degree level.

SCC granted the OTA program approval to pursue mission expansion and develop bachelor-level curriculum. This proposal is an attempt to seek approval from the state governing board. If the OTA program is granted the mission expansion by MDHE and CBHE and is allowed to continue with the new academic program proposal process, the program will submit a letter of intent to ACOTE and an application for candidacy. Since the OTA program at SCC is already accredited by ACOTE, it is not considered a new program and therefore will be able to immediately apply for candidacy.

Any institution who intends to offer a bachelor's of OTA program must follow ACOTE Candidacy Requirements. Included in these requirements is the hiring of a qualified program director one year prior to submitting a letter of intent and would apply to all public, 4-year institutions in the state of Missouri. New programs cannot accept students until meeting initial requirements and waiting until application review is available. This process could take a minimum of three to five years.

June 17, 2019

Courtney Barrett, M.Ed., OTR/L, CBIS  
Associate Professor - Program Director  
Occupational Therapy Assistant Program  
St Charles Community College  
#1 Academy Place, Dardenne  
Prairie, MO 63368

Ms. Barrett:

Here is the letter that you requested which provides a rationale for ACOTE's decision to offer two points of entry (associate's level & baccalaureate level) for the occupational therapy assistant.

AOTA's Representative Assembly (RA) convened an Ad Hoc Committee to do a feasibility study in 2015 regarding degree level for the occupational therapy assistant. The committee looked at the following areas:

1. Defining expectations of practice for an OTA in the next decade.
2. Growth in content to address changes in practice.
3. Impact of any changes in entry-level degree requirements for the occupational therapists (e.g., doctoral requirement) on occupational therapy assistant education and practice.
4. Readiness of host institutions to support a transition to the bachelor's requirement and the trend in community colleges to offer a limited number of bachelor's degrees.
5. Faculty workforce including occupational therapy assistants with post-baccalaureate degrees.
6. Impact of regulatory changes associated with the Affordable Care Act (ACA) and impact on reimbursement.
7. The potential impact of increased costs on key stakeholders (i.e. students, employers, etc.)
8. Requiring the entry-level degree to be at the doctoral level could push more potential students into occupational therapy assistant programs because of the increased costs of a doctoral versus masters-level program.

See attached appendix for the full detailed report.

ACOTE developed and approved occupational therapy assistant baccalaureate level Standards in August 2018. This was done to provide occupational therapy assistant programs with the option to transition their programs to the baccalaureate level to address some of the knowledge gaps identified in bullets 1-3 above. They felt that it was the path to maintain and retain occupational therapy assistants' patency in the future healthcare workforce. ACOTE believes that providing the additional content will equip students with the skills needed to address the issues related to complex healthcare systems and complex patients. If I can be of further assistance, please contact me at ssalvant@aota.org.

Sincerely,



Sabrina Salvant, EdD, MPH, OTR/L  
Director of Accreditation



**Steve Ehlmann**  
County Executive

**Joann Leykam**  
Director of Administration

**Jennifer George**  
Assistant Director of Administration

**John Greifzu**  
Assistant Director of Administration

June 26, 2019

Missouri Department of Higher Education  
205 Jefferson Street  
PO Box 1469  
Jefferson City, MO 65102-1469

To Whom it May Concern,

It is my pleasure to offer a letter of support for St. Charles Community College's proposal to expand their Occupational Therapy Assistant (OTA) program to offer a Bachelor of Applied Science degree. For more than 30 years, St. Charles County has been the fastest growing part of the St. Louis region and the fastest growing county in Missouri. With nearly 400,000 residents, a well-trained healthcare workforce is vital to our region and is one of the top priorities for the county.

St. Charles Community College is well known both locally and in surrounding counties for the high level of skill, knowledge, and practical understanding possessed by graduates of their health care programs. Expansion of the Occupational Therapy Assistant program will be an exciting step forward both for our citizens who want to begin or expand their careers and for our community of healthcare providers who are in need of skilled professionals.

I would appreciate your strong consideration for approval of the proposal presented by St. Charles Community College.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Ehlmann".

Steve Ehlmann  
County Executive  
St. Charles County Government



Community

Strong

*Inspiring a culture  
of health and  
wellbeing in St.  
Charles County*

June 26, 2019

Dr. Barbara Kavalier-President  
St. Charles Community College  
4601 Mid Rivers Mall Dr.  
Cottleville, MO 63376

Dear Dr. Kavalier,

I am writing on behalf of Community Strong in support of the St. Charles Community College's continual efforts to meet the complex needs of healthcare through first-class educational standards. We strongly support St. Charles Community College and your laser focus to provide the highest level of education possible to your students.

As an organization, whose mission is to inspire a culture of health and wellbeing in our community we strongly value our partnership and collaborative efforts with St. Charles Community College. St. Charles Community College affords us critical pieces of support through not only first class curriculum but meeting very specific needs our community has for workforce development. St Charles Community College is a reputable leader not only in the education realm but through community involvement as evidenced through your support of the county wide health initiative led by Community Strong. We look forward to working with you to continue to create an epidemic of health and wellness in St. Charles County to inspire and educate our community.

If I can be an additional source of information or recommendation for your goals and objectives, please do not hesitate to reach out via email at [cfiggins@edcscc.com](mailto:cfiggins@edcscc.com) or phone 636-229-5282.

Sincerely,

  
Carissa Figgins

Executive Director

Community Strong-EDC



27 June, 2019

Zora Mulligan, J.D.  
Commissioner of Higher Education  
205 Jefferson Street  
P.O. Box 1469  
Jefferson City, Missouri 65102-1469

Dear Ms. Mulligan:

I am proud to lend my support to the proposal by St. Charles Community College to offer a bachelor's of applied science degree in the field of Occupational Therapy Assistant (OTA). This field has done significant work in the past few years to adapt to the changing landscape in medicine and respond to the needs of patients, other healthcare professionals, and insurers. Because of the expanding scope of practice in the field and the need for OTAs to assume managerial roles, the employability of OTAs increasingly depends upon their ability to attain bachelors' degrees.

We have wonderful relationships with our four-year partners throughout the state, and we articulate many programs with them. However, no bachelor's programs in OTA exist anywhere in the state. Recently I spoke with Dr. Thomas George, Chancellor of the University of Missouri-St. Louis. While he was unwilling to relate such in writing, he verbally confirmed that UMSL does not award this degree nor offer classes in the field. Given this fact and the realities of new program approval by the Accreditation Council for Occupational Therapy Education (ACOTE) that are outlined in our proposal, collaboration and articulation are not possible now, nor would they be for many years.

I am confident that our proposal has considerable merit, and I respectfully request that the Missouri Department of Higher Education and the Coordinating Board for Higher Education give it full consideration through its comprehensive review process.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Bookstaver".

John D. Bookstaver, Ph.D.

Vice President for Academic Affairs and Enrollment Management

Missouri Department of Higher Education  
205 Jefferson Street  
P.O. Box 1469  
Jefferson City, MO 65102-1469

To whom it may concern:

I am writing this letter of support for the Occupational Therapy Assistant (OTA) Program at St Charles Community College (SCC) to pursue and provide a bachelor's degree of applied science for the Occupational Therapy Assistant.

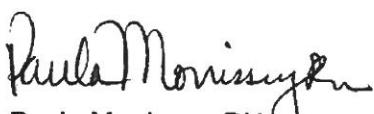
Since the state of Missouri now has legislation in place that allows community colleges to offer a bachelor's degree for a program that meets a workforce demand and demonstrates that the level of education to offer professional services increases to a bachelor's level, I would like to articulate why St Charles Community College's Occupational Therapy Assistant Program is an excellent candidate.

We have enjoyed the benefits of the OTA program's commitment to academic excellence and service to the community through our fieldwork partnership. We believe the OTA program continues to fulfill their responsibility to best serve the needs of our community in addressing the evolving nature of healthcare service delivery and we believe the additional bachelors curriculum would be of great benefit both the students and our community.

Specifically, we believe the students of SCC would be able to provide enhanced services to our population if given the opportunity to create, develop, and engage in additional programming through their Baccalaureate Project. The Occupational Therapy Assistant Program provides its students with the opportunity to develop the knowledge, skills, behaviors, and attitudes necessary for ethical, competent, and reflective practice in fulfilling their professional roles. That dedication to excellence is evident in the fieldwork students we have worked with from St Charles Community College.

I trust SCC's OTA program to provide the current, future, and potentially former graduates an affordable, accessible, and high quality bachelor's degree to meet growing professional and workforce demands. I support the OTA program in working to expand their mission to respond to the growing needs of our community. I encourage you to support the OTA program in allowing them to develop additional opportunities to meet the dynamic health care needs of our community.

Sincerely,



Paula Morrissey, RN  
Director of Seniors & Co. Adult Day Services

Missouri Department of Higher Education  
205 Jefferson Street  
P.O. Box 1469  
Jefferson City, MO 65102-1469

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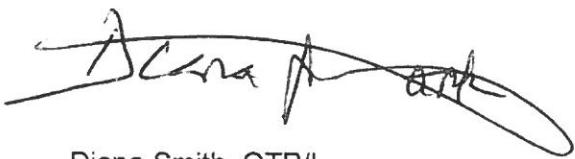
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Sincerely,



Diana Smith, OTR/L  
Director of Rehabilitation  
Villages of St. Peters



Missouri Department of Higher Education  
205 Jefferson Street  
P.O. Box 1469  
Jefferson City, MO 65102-1469

To whom it may concern:

I am writing this letter of support for the Occupational Therapy Assistant (OTA) Program at St Charles Community College (SCC) to pursue and provide a bachelor's degree of applied science for the Occupational Therapy Assistant.

Since the state of Missouri now has legislation in place that allows community colleges to offer a bachelor's degree for a program that meets a workforce demand and demonstrates that the level of education to offer professional services increases to a bachelor's level, I would like to articulate why St Charles Community College's Occupational Therapy Assistant Program is an excellent candidate.

We have enjoyed the benefits of the OTA program's commitment to academic excellence and service to the community through our fieldwork partnership. We believe the OTA program continues to fulfill their responsibility to best serve the needs of our community in addressing the evolving nature of healthcare service delivery and we believe the additional bachelors curriculum would be of great benefit both the students and our community.

Specifically, we believe the students of SCC would be able to provide enhanced services to our population if given the opportunity to create, develop, and engage in additional programming through their Baccalaureate Project. The Occupational Therapy Assistant Program provides its students with the opportunity to develop the knowledge, skills, behaviors, and attitudes necessary for ethical, competent, and reflective practice in fulfilling their professional roles. That dedication to excellence is evident in the fieldwork students we have worked with from St Charles Community College.

I trust SCC's OTA program to provide the current, future, and potentially former graduates an affordable, accessible, and high quality bachelor's degree to meet growing professional and workforce demands. I support the OTA program in working to expand their mission to respond to the growing needs of our community. I encourage you to support the OTA program in allowing them to develop additional opportunities to meet the dynamic health care needs of our community.

Sincerely,

Tyler McClain  
Clubhouse Supervisor  
Headway Clubhouse  
322 McDonough St.  
St. Charles MO 63301

Missouri Department of Higher Education  
205 Jefferson Street  
P.O. Box 1469  
Jefferson City, MO 65102-1469

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Sincerely,

Kathy Drews  
Director, St. Charles Community College CDC

Missouri Department of Higher Education  
205 Jefferson Street  
P.O. Box 1469  
Jefferson City, MO 65102-1469

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Sincerely,

*Katherine Mawee*  
Associate Director CDC

**Professional Accreditation Sources:**

2018 ACOTE Standards and Interpretive Guide  
2018 OTA-B Candidacy Application  
2015 Ad Hoc OTA Education Committee Executive Summary Report  
ACOTE Accreditation Process for New Programs Application Review  
ACOTE Description of the Process for Transitioning Programs  
Remaining Slots for New Program Applications - AOTA  
AOTA Vision 2025  
AOTA Journal: Fieldwork Opportunities for Enhancing Occupational Therapy's Role in Preventive Care  
AOTA Journal: Occupational Therapy Practitioners: A key member of the Community Behavioral Health team

**Missouri Educational and Legislative Sources:**

A stronger MO through Higher Education Report  
MDHE Blueprint for Education Goals Overview  
MDHE Blueprint for Education Executive Summary  
Missouri Comprehensive Fee Survey for Public Institutions of Higher Education: FY2019 Two-Year  
Missouri Comprehensive Fee Survey for Public Institutions of Higher Education: FY 2019 Four-Year  
Missouri House Bill 758

**College and OTA Program Sources:**

OTA Bridge to Bachelor Market Report - May 2019  
SCC OTA Program Mission Philosophy and Curriculum Design  
St Charles Community College Faculty Data Forms  
Letters of Support

## OTA Bridge to Bachelor-Degree Market Report- St Charles CC

Report summarizing OTA Missouri Marketplace Engagement data research and project analysis,  
articulated to provide context and relevance to the Market Study



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Prepared by:



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*Disclaimer: This document is intended as informational in purpose and should not be construed to convey a guaranteed level of performance of the client or author. Statements within the report are subject to the opinions of survey respondents and examples drawn from public and private resources. Accuracy of data is limited in relevance to the snapshot of time in which the information was drawn.*

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## Introduction

### Summary Explanation

St. Charles Community College (the “College”) has a long-standing history of investing in their community by providing quality education that matches community need. This includes an Associate of Applied Science Degree within the OTA Program that allows for general education and fieldwork specific to the degree, which translates to an 80+ hour program. In the fall of 2018, the Accreditation Council for Occupational Therapy Education (ACOTE®) released new standards of practice for the Occupational Therapy field. This new standard puts into practice a new entry-level enrollment for OTA national accreditation as a baccalaureate-level degree program.

Upon release, St. Charles Community College began reviewing their OTA Program (the “Program”) to confirm the viability, both technically and in operations, of expanding its current program offering to include a Bachelor of Arts Degree for Occupational Therapy Assistants to meet the changing dynamics of national professional standards. Technically, the College is a community college and by state statute and its own mission it serves to offer Associate Level Degrees and technical training. Operationally, the Program Chair has been watching the trend within the industry and has designed their program to meet and exceed those national industry qualifying standards.

After contacting the Missouri Department of Higher Education’s Coordinating Board for Higher Education (CBHE) to determine the feasibility of an application to expand the Academic Program, the College chose to pursue a summary review of internal practices and a snapshot study of the Missouri OTA Marketplace from both an educator’s and industry specialist’s perspective.

### OTA Program Exploration Objective

Occupational Therapy, by definition, is a client-centered health profession and the practice of helping people across the lifespan through therapeutic use of daily activities (occupations). This client practice ranges the spectrum in primary, preventative and tertiary care. There are two professional certifications in the field: 1) Occupational Therapist, which requires a masters or doctorate level degree plus certification/ licensure and 2) Occupational Therapist Assistant, which current requires an Associate-level degree plus licensure.

The College is pursuing an application with the Missouri Department of Higher Education to add a Baccalaureate Degree of OTA curriculum within the St. Charles Community College OTA Program. The Program’s objective aligns with national and state educational standards while meeting workplace demand and assisting students to attain the highest professional placement to the best of their abilities.

### OTA Program Requirements

- Proposed program aligns with AOTA – Vision 2025
- Proposed program aligns with MDHE Blueprint for Higher Education (2025 focus)
- Cost of Educational Attainment is Lower
  - Cost per credit hour is lower for proposed program than 4-year institution offering

### OTA Program Goals

- Increase Number of Students to meet Workforce Demand

- Align Student Qualifications / Degrees with Market Demands
  - Expectation of competency standards
- Increase direct Placement of Bachelor-level prepared Students to meet Industry

### **Marketplace Study Objective**

The College commissioned River Henge Partners LLC to perform a Missouri Marketplace Study to provide data relative to the Occupational Therapy Assistant (“OTA”) workforce qualifications for graduate placement within the state of Missouri. The “OTA Missouri Marketplace Engagement Data Study” (“Data Study”) was designed to capture data on positions marketed upon exit of educational institution and employer’s qualifications to confirm additional skills-sets or professional-level requirements.

### **Third-Party Review and Reporting**

Separately, River Henge Partners LLC, a business consulting firm specializing in industry-sector data analytics, was commissioned to provide Summary Reporting of the external Study findings. River Henge Partners is a private sector catalyst rooted in data research, analytics and hands-on experience to guide master-planned economic development.

With a combined 30 years of experience in economic development - including urban and rural planning and another 20 years in data research and analysis, River Henge Partners offers customized data for communities and industries in any economic and industry sector.

### **Scope of Work**

The Scope of Work for the “OTA Bridge to Bachelor-Degree Market Report- St Charles CC” (the “Report”) includes:

Articulated Report summarizing OTA Missouri Marketplace Engagement data research and project analysis, articulated to provide context and relevance to the Market Study

### **Report Background**

#### **Report Purpose**

The purpose of the “OTA Bridge to Bachelor-Degree Market Report” is to draw together information gathered from the Study’s dataset and Interpretation of Summary Findings, conducted by a separate third-party company, and provide a contextual framework as a baseline consideration for the Program’s potential expansion.

#### **Field Research**

#### **Report Project Basis**

The baseline data necessary for Reporting includes the confirmation of educational programs, job positions and placement and contextual information from education and industry that work directly with OTA workplace productivity (dataset from Study). Also included in review for reporting are the separate Analysis of the Study, the College’s Microburst session outline, and the foundation of national

accreditation requirements published by ACOTE®. The Report is a summation of the results of the St. Charles Community College Planning Session, Study, and Study Analysis.

#### Exceptions

The Report is not designed to be a comprehensive business plan for the move to formalizing a bachelor program at the St. Charles Community College. While parts of the Report may be utilized in their application, should the College seek to pursue program expansion, this document is not intended as a comprehensive prospectus for the Program.

The Report is based on a snapshot of information, taken at the time of Study and Survey. The report does not reflect an opinion by the contracted third-party and should not be construed as an endorsement by any particular company, program, or person.

#### **Dataset Conditions and Considerations**

Study parameters were limited to identifying and verifying positions currently marketed upon graduation from qualified Occupational Therapy educational programs and industries offering employment to confirm additional skill sets or professional level requirements. Qualifiers included: initial requirement matched OTA-level entry and operations which were located within the defined geographic scope.

Considerations in the Marketplace Study included a) educational institutions offering OT, OTA and Pre-OT programming operating in the state of Missouri, b) student placement (positions and industries) information post-exit, and c) job descriptions offered by company's advertising OTA positions, located within the geographic scope. Analysis of the Marketplace Study was conducted by a separate company.

#### **Dataset- Methodology (Data Collection)**

Study Methodology for Education included:

- Collect Community College, College and University Data (Missouri)
- Confirm Program Definition
- Collect Data from question set – direct phone call

Study Methodology for Industry included:

- Keyword Research – Search Engine, Industry Database
- Catalog results – Job Title, Company, Location, Salary
- Collect 20-30 samples of detailed job postings
- Verify percentage of sampling to confirm qualifications- direct phone call

The two primary questions for Education Engagement were:

1. Outside of the OT and OTA job titles themselves, what other Positions are marketed to graduates?
2. Beyond healthcare, what other industries are hiring?

Three primary questions for Employer Engagement hiring OTA Graduates were:

1. Outside of the standard OTA requirements, what are you looking for in new hires?
2. How do you see the OTA Position and the requirements evolving in your industry?
3. What do you see as the evolution of the OTA Position in your business?

### Qualifiers for Analysis

The defined parameter for analysis is limited to current conditions as identified in the dataset provided. The Analysis is specific to employer engagement relative to the available workforce placement in the pre-defined marketplace. In review and consideration are:

- Position Response – Education
- Education Survey – Positions, Industry-type
- Position Sampling – Industries/Companies
- Employer Survey- Roles, Responsibilities (current), Future

Key qualifier for analysis:

- Clearly identified educational systems operating in the state of Missouri – and in good standing with ACOTE.
- Job placement within the state of Missouri
- Analysis of data to segregate additional educational or professional requirements, if any
- If available, analysis of contextual comment – subjective to the qualified person being interviewed

### Report Documentation

River Henge Partners reviewed the following documents for reference and inclusion:

- OTA Missouri Marketplace Engagement Study – Dataset Summary
- OTA Marketplace Engagement Analysis Summary Outline
- St Charles Community College provided information:
  - AOTA Current Trends in Accreditation and Higher Education April 2018 presentation
  - September 2018 ACOTE Standards
  - MDHE – A Blueprint for Higher Education (in Missouri)
  - St Charles Community College OTA Program Microburst Planning Outline
- 2018 MO Economic Report – Missouri Department of Economic Development

### Considerations

#### Geographic Boundaries

Reporting criteria is limited to the state of Missouri for education and industry defined marketplaces. Since both the OTA Educational Program requirements and the Professional OTA certification are national, consideration accounts for prevailing industry standards.

#### Job Title Specificity

OTA's are referred to as COTA's in the workforce. This points to the passage of the National Board for Certification in Occupational Therapy (NBOCOT) Board Certified Exam which OT's and OTA's pass to practice within their profession and license as per Missouri state requirements.

### Marketplace Engagement

The data gathered reached into the State of Missouri's educational environment, active labor market, and collected job descriptions and positions which posed an industry standard. The raw data itself captures only part of the story. The Study process engaged both educators who have direct responsibility in transitioning students to the workforce and industry experts (department heads, therapy managers, talent acquisition) who work daily with OTAs in their respective work environs. This direct marketplace engagement provides a snapshot of what is happening within the industry today from a workplace and education/ workforce training perspective.

## **Report Findings**

### **Key Definitions and Distinctions**

Occupational Therapy: According to the American Occupational Therapy Association (AOTA), Occupational Therapy is the only profession that helps people across the lifespan to do the things they want and need to do through the therapeutic use of daily activities (occupations). Occupational therapy practitioners enable people of all ages to live life to its fullest by helping them promote health, and prevent - or live better with - injury, illness, or disability.

Common occupational therapy interventions include helping children with disabilities to participate fully in school and social situations, helping people recovering from injury to regain skills, and providing supports for older adults experiencing physical and cognitive changes.

Occupational Therapists must complete a Masters-level Degree (MSOT) (MOT) or Doctorate (OTD), pass a national certification board test, and receive state licensure.

Occupational Therapy Program: Institutions which offer entry-level master's or doctoral programs that are accredited by the Accreditation Council for Occupational Therapy Education (ACOTE®).

Occupational Therapy Assistants: AOTA states “Occupational Therapy Assistants play a key role in providing occupational therapy services in every area of practice.” A Certified Occupational Therapy Assistant (“COTA”) works similarly to a Physician’s Assistant, wherein they can work directly with a patient and direct program, under the supervision of an OT. There is a legal and technical separation of roles and responsibilities between the OT and OTA.

Occupational Therapy Assistant (“OTA”) Program: OTA programs are educational programs accredited by the Accreditation Council for Occupational Therapy Education (ACOTE®). On-site evaluations for program accreditation are conducted at 5 or 7 year intervals for initial accreditation and 5, 7, or 10 year intervals for continuing accreditation.

Certification: The National Board for Certification in Occupational Therapy (“NBCOT”) administers a qualified exam which results, for those who pass, in a federally-designated professional certification required by most states in order to practice in their respective professional field. The standard definition of a COTA is an OTA who has passed the equivalent of the OTA bar to become nationally certified to practice in their respective field.

Licensure: In addition to professional certification, most states require the COTA to be licensed and registered in the state to practice professionally (i.e. Missouri Division of Professional Registration).

American Occupational Therapy Association (AOTA) Industry Standards: Across the board in the Occupational Therapy spectrum of education AOTA through ACOTE accreditation maintains “the dynamic nature of contemporary health and human services delivery systems provides opportunities for the (OT professional) to possess the necessary knowledge and skills as a direct care provider, educator, manager, leader, and advocate for the profession and the consumer.” The organization maintains that Innovation within Higher Education is “Alternate delivery models that increase accessibility and decrease costs.” This includes competency-based degrees such as the OTA degree program.

Missouri Board of Higher Education (MBHE) Educational Standards: The coordinated plan for higher education in Missouri states “the private and public benefits of higher education are the building blocks of a vibrant society, a thriving economy and a good quality of life for all Missourians.” Adopted by the Coordinating Board for Higher Education (CBHE), “Preparing Missourians to Succeed: A Blueprint for Higher Education” focuses on five core goals (abridged):

1. Educational Attainment
2. Affordability
3. Quality and Relevancy
4. Research and Innovation
5. Investment, Advocacy and Partnerships

St Charles Community College Mission Standards: The Mission states that SCC serves the community by focusing on academic excellence, student success, workforce advancement, and life-long learning within a global society. The Allied Health Field and OTA program directors both indicate that it is their mission to align with newly defined ACOTE standards and MDHE Blueprint Plan which list competency-based learning as vital for student education, alignment with industry and affordable cost of education.

### **Meeting Educational Challenge**

AOTA maintains that Innovation within Higher Education is “Alternate delivery models that increase accessibility and decrease costs.” This includes competency-based degrees such as the OTA degree program.

There is a shift in Occupational Therapy education that changes the entry-points for students seeking certification. ACOTE has mandated that the entry-level degree requirement for the occupational therapist will move to the doctoral level by July 1, 2027.

The educational gap created between the supervising OT and the OTA explains the rationale for ACOTE to introduce a bachelor’s degree point of entry to OTA professional certification. The move in profession to a bachelor’s requirement underscores the knowledgebase need Missouri’s industry professionals already are experiencing. Two key observations from the Study include:

- Education, field work experience and training required is entirely Industry driven
- Industry is pushing for additional education and experience to provide a base to increase OTA responsibility and to bridge the knowledgebase divide between OT’s and OTA’s.

St. Charles Community College states the OTA Program is uniquely aligned and positioned to provide enhanced professional entry-level requirements for a Baccalaureate Degree of Occupational Therapy

Assistant in addition to offering an updated curriculum for their current Associate of Applied Science Degree (A.A.S).

### **Workplace Feedback**

#### **Education Survey- Salient Points**

Of forty-three (43) higher education schools offering degrees and programming that reach throughout Missouri's Occupational Therapy Spectrum, there are sixteen (16) colleges, universities and technical schools that are focused on OTA programming. However, within the sixteen (16), there are only nine (9) unique active OTA programs accredited through ACOTE®, of which two (2) are private schools. A Consortium of schools accounts for one (1) unique active program but represents seven (7) advertised programs. Three (3) of the nine (9) unique OTA programs are in the St. Louis Region, including St. Charles Community College.

#### **Industry Survey – Salient Points**

During the Study, the data research firm found ninety (90) active job listings referencing key words "OTA", "COTA", and "Occupational Therapy Assistants". Forty-one (41) companies posted listings including health systems, home health, skilled nursing, acute and inpatient care, medical spas, rehabilitation centers, psychiatric centers and Professional Management companies. Twenty-one (21) companies were selected to provide job position sampling and marketplace feedback. Twelve (12) confirmed OT use as part of their healthcare protocol. Eight (8) companies responded with contextual feedback. Key industry points to consider:

- Majority of positions are offered by professional management companies – which means that the entry-level person may work at multiple facilities within the region or work for managed care.
- 4 of 8 respondents utilize a management company for services within their facility
- Minimum expectation is that the OTA is a COTA, nationally certified and state licensed
- Missouri's per capita personal income was \$43,661 in the 2017, according to the 2018 Mo Economic Report – MERIC/MoDED
- Salary basis for COTA in Missouri is reported at a range between \$38,771- \$61,405 in the St. Louis marketplace with an average reported across the state at approximately \$55,000.

### **Challenges**

#### Marketplace

There is an industry stated trend showing decreasing utilization of OTA's in an inpatient and acute-care setting (traditionally strong placement) caused by the shift in patient turn-around and in-flux evaluations. Quite simply, patients are staying for shorter periods of time in the hospital setting and the patient load can be, according to those interviewed, 10-15 patient evaluations in-flux a day. Because of that, there may be a squeeze in local markets affecting placement of newly graduated students without significant fieldwork experience.

#### Operational (Local)

The identified need for OTA expansion is driven by workforce demand, competency-based student preparation, and professional placement. The challenges St. Charles Community College must overcome to introduce the new degree level are twofold: 1) accrediting body approval at the state and federal level and 2) unknown competition pursuing 4-year degree designation.

## Opportunities

### Marketplace

According to the “2018 Current Trends in accreditation and Higher Education” presentation by AOTA on April 19, 2018, the US Bureau of Labor Statistics indicates that Occupational Therapy Assistants is the 15<sup>th</sup> fastest growing occupation in the US, with predicted Job Growth from 2016-2026 equaling >28%.

The results of the OTA Missouri Marketplace Engagement Study supports a rapid progression of industry adoption. The Study results suggested the two industries within healthcare experiencing the most opportunity for COTA placement are the skilled nursing and home health industries.

Furthermore, interview respondents indicated that there are multiple driving factors such as change in regulations which expanded responsibilities of the OTA, shift in direct patient care by the OT into a purely administrative and oversight role leaving the OTA in an even more essential position as the primary patient care provider, and shift in insurance billing (PTPM) which affects the billed time and company reimbursement processes.

### Industry Outliers

For the Study Researchers did gather subjective examples of non-traditional OTA job positions, which were subject to the opinion of the author. Formal Study search parameters did not specifically meter non-traditional job titles, unless otherwise inclusive of with COTA qualification within the definition or job search, as those bleed outside the spectrum of verifiable COTA-qualified job positions. Industry respondents were all within the health-care field.

Educators indicated they are seeing expanded interest from corporate and non-traditional workplaces seeking an OTA knowledgebase as a key member of their staff. Examples for this are ergonomic specialists, wellness coaching, program design and chronic disease support foundations.

### Operational (Local)

The self-defined goals for OTA Program expansion are student centric. If successful in receiving approval for expansion, the defined opportunities for the student and institution are 1) student educational attainment, 2) workforce need, 3) community engagement, 4) program innovation, and 5) affordability for the student.

Opportunities Specific to St. Charles Community College and their area served include:

- Workforce Preparation and Placement
- Community Outreach/ Engagement
- Research and Innovation (within the OTA field)
- Affordability

## Key Points

### Planning

St. Charles Community College is currently offering an OTA Associate Degree program. Core components for expansion are already in place, should acceptance be granted to expand.

- Classes provide application of skills = COMPETENCY-BASED Curriculum Design
- Professional – Licensed Designation, Standards-driven versus generalized coursework
- St Charles Community College has already invested in the real estate in which to expand curriculum and lab work for additional programming and student enrollment.
- The expertise and leadership are already on-site to design the program.
- Staffing exists within the program department to meet a Bachelor-level degree and Associate-level curriculum.
- There exists the faculty interest to expand to include an OTA Bachelor's Degree program
- There is expressed student interest in both an Associate and Bachelor's Degree for OTA
- The private-sector field-work partners are willing to engage students as part of the learning environment which creates placement opportunities throughout the St. Louis Metro and Missouri
- Need an approved College Mission change and MDHE approval to expand to a baccalaureate-level program

### Analysis

- The Education, field work experience and training required is entirely Industry driven
- Typical entry-level employment is in a clinical setting, which is considered “traditional” in the health-care field
- Industries include hospitals, clinics, mental health, pediatrics, acute-care and skilled nursing
- Some industry outliers exist - school districts (still a traditional placement), private- based placements that are entrepreneurial (i.e. adaptive martial arts; therapeutic horseback riding, tele-health and wellness/job coaches)
- The role of the OTA throughout the health-care industry is changing
- Industry expectation of OTA performance breach typical curriculum-based training and include professional communication, time management, stress management, administrative and reporting responsibilities and a certain amount of physicality to perform tasks on the floor and in the field.

### Study Outcomes

- Both educators and industry specialist have seen a shift in responsibility to the OTA for direct patient care
- According to industry experts commenting during marketplace engagement, the role of an OTA in the health-care field will be more critical as their responsibilities increase and as insurance reimbursement and billing regulations come online.
- Educators maintain that the demand is outstripping placement and as awareness of OTA skill-sets increase, more corporate and private emerging fields will open.
- Industry is pushing for additional education and experience to provide a base to increase OTA responsibility and to bridge the knowledgebase divide between OT's and OTA's.

## Summary Conclusion

Occupational Therapy helps people across the lifespan to do the things they want and need to do through the therapeutic use of daily activities (occupations). Practitioners are tasked to enable people of all ages to live life to its fullest by helping them promote health, and prevent—or live better with— injury, illness, or disability.

Occupational Therapy Assistants are licensed, certified, professional health care providers who plays a vital role in patient well-being by providing direct patient care, instructional training, and human interaction. According to the industries represented in Marketplace Engagement, OTAs represent a critical link in patient recovery and wellness.

The expected amount of education, fieldwork and experience prior to OTA's entering the workforce is expanding to meet the roles and responsibilities within the healthcare field and those respective industries. Per the recommendation of the nationally accrediting body, the spectrum of education provided as an entry-point into the field is shifting to match market demand and the realistic functional role of the professional.

Outside of the healthcare industry, the role of the OTA is changing. As corporate awareness about the Occupational Therapy and the skillset of a qualified COTA grows, emerging fields will follow. This introduces new markets, creates competition for OTA's outside of their current respective certified fields, and places new relevance on the health-care fields demand for increased knowledgebase and fieldwork experience.

According to the 2018 MO Economic Report conducted by the Missouri Department of Economic Development, The Health Care and Social Assistance industry sector is the number one employer in Missouri. Market trends indicate the Healthcare and Social Services industry is growing. Health Care and Business / Management related jobs are the most in demand occupations within the state.

St. Charles Community College is currently offering an OTA Associate Degree program. There exists the faculty interest to expand to include an OTA Bachelor's Degree program. This interest aligns with newly released recommendations for professional educational standards.

The College has positioned for this expansion by the staffing, real estate and lab-space for student training. The expertise is already on-site to design the program. This affords the College a unique position as an early adopter, both in Missouri and the national educational marketplace.

If successful in receiving MBHE approval for expansion, the defined opportunities for the student and institution are 1) student educational attainment, 2) workforce need, 3) community engagement, 4) program innovation, and 5) affordability for the student. The proposed OTA Program expansion positively impacts workplace preparedness and meets forecasted marketplace demand.

Semester 1	Course Name	Credit Hours
MAT 147	Healthcare Statistics	3
PSY 101	Introduction to Psychology	3
GenEd Civics	PolSci/Gov	3
COM 110	Interpersonal Communication	3
ENG 102	English Comp II	3
OTA 100	Intro to OTA Baccalaureate Project	1
	Semester Credits:	16
Semester 2	Course Name	Credit Hours
OTA 200	Occupational Justice and Social Determinants of Health	3
GenEd/C42 Elective	History of Disability & Marginalized Populations	3
PSY 210	Human Growth & Development	3
OTA 215	Functional Anatomy & Kinesiology	3
SOC 341	Medical Sociology	3
	Semester Credits:	15
Semester 3	Course Name	Credit Hours
IPE 378	Healthcare Quality Management	3
CDF 532	Family Advocacy	3
EDU 247	Multicultural Education	3
OTA 200	Occupational Science	3
OTA 201	Applied A&P in Health & Disease	4
	Semester Credits:	16
Semester 4	Course Name	Credit Hours
BUS 105	Business Ethics	3
IPE 379	Interprofessional Perspectives on Population Health	3
IPE 382	Intro to Health Insurance and Managed Care	3
OTA 301	Foundations of Occupational Therapy	3
OTA 311	Engaging in Occupation Across the Lifespan	3
	Semester Credits:	15
Semester 5	Course Name	Credit Hours
BMS 599	Health Literacy in the Human Services	3
MGM 340	Principles of Management	3
OTA 305	Foundations of OTA Practice I	5
OTA 315	Foundations of OTA Practice Lab I	3
OTA 325	Foundations of OTA Field Experience	2
	Semester Credits:	16
Semester 6	Course Name	Credit Hours
OTA 405	Foundations of OTA Practice II	5
OTA 415	Foundations of OTA Practice Lab II	3
OTA 425	Foundations of OTA Field Experience II	3
OTA 302	Bacalaureate Project	3
OTA 312	OTA Portfolio	1
	Semester Credits:	15
Semester 7	Course Name	Credit Hours

## SCC/MSU Joint BOTA Degree Plan

OTA 406	Foundations of OTA Practice III	5
OTA 416	Foundations of OTA Practice Lab III	3
OTA 426	Foundations of OTA Field Experience III	3
OTA 402	Bacalaureate Project II	3
OTA 412	OTA Portfolio II	1
	Semester Credits:	15
Semester 8	Course Name	Credit Hours
OTA 427	OTA Practicum	4
OTA 428	OTA Practicum	4
OTA 407	OTA Capstone	2
OTA 404	Bacalaureate Project III	2
	Semester Credits:	12
	Total Credits:	120

## **Amended and Restated Memorandum of Understanding**

This Amended and Restated Memorandum of Understanding ("Amended Agreement") is made on September 1, 2020, by and between St. Charles Community College, 4201 Mid Rivers Mall Drive, Cottleville, MO 63376, (hereinafter referred to as "SCC") and The Board of Governors of Missouri State University, 901 S. National Avenue, Springfield, MO 65897, (hereinafter referred to as "MSU") for the purposes of further describing the mutual obligations and commitments of the Parties regarding the Project as described in the Memorandum of Understanding entered into between SCC and MSU made on March 4, 2020 ("Agreement").

WHEREAS SCC and MSU entered into the Agreement for the purpose of achieving the various aims and objectives relating to a joint degree of Bachelor of Applied Science in occupational therapy assistant (the "Project"), the Agreement is herein attached and incorporated as Schedule 1.

WHEREAS SCC and MSU wish to further articulate certain operational aspects regarding the Projects and more fully set forth the mutual obligations and commitments regarding the Project.

NOW THEREFORE, the Parties herein enter into this Amended Agreement

- 1. Project / Degree.** The Degree details, including the courses required and the institution responsible for the instruction, are set forth more fully in Schedule 2. Provided that all necessary approvals have been obtained, Section 3.B., the Parties will begin to offer the Degree during the fall 2021 semester.
- 2. Term.** Notwithstanding Term as set forth in the Agreement, this Amended Agreement (and the Agreement) may be terminated, with or without cause, by either Party following sixty (60) days prior written notice; provided that both Parties will work together in good faith to successfully conclude any existing Degree student who is already enrolled in the Degree prior to such termination.

### **3. Mutual Obligations of the Parties**

- A. The parties shall mutually develop admissions criteria for student to the Degree.
- B. The parties shall work mutually and individually to receive all necessary internal and external approvals required for the Degree to be offered at their respective institutions and a diploma awarded at the completion of the Degree including, without limitation, approval from the Coordinating Board of Higher Education ("CBHE"), Missouri Department of Higher Education & Workforce Development ("MDHEWD"), the Higher Learning Commission ("HLC"), the Accreditation Council for Occupational Therapy Education ("ACOTE"), and/or any institutional committees necessary to review institutional degree programs.
- C. The parties shall apply their unique policies and procedures, including any policies regarding student conduct and academic integrity to students in the Degree program as it relates to the students' participation in courses at the relevant institution. The parties agree to reasonably share information regarding students in the Degree program consistent with the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99).

- D. The parties will not discriminate on the basis of race, color, national origin (including ancestry, or any other subcategory of national origin recognized by applicable law), religion, sex (including marital status, family status, pregnancy, sexual orientation, gender identity, gender expression, or any other subcategory of sex recognized by applicable law), age, disability, veteran status, genetic information, or any other basis protected by applicable law in the Project. Sex discrimination encompasses sexual harassment, which includes sexual violence, and is strictly prohibited by Title IX of the Education Amendments of 1972.
- E. The parties will apply their own institution specific academic integrity policies regarding any issues related to allegations of violations of same.

**4. Party Specific Obligations:**

A. SCC's party specific obligations:

- 1. SCC will have primary responsibility for admitting students to the Degree program based on the mutually agree on the admissions criteria for the Degree program from which SCC will evaluate students. As identified in Section 3.B., MSU will admit, for purposes of this Project, any student SCC admits to the Degree program pursuant to that admissions criteria.
- 2. SCC will be designated as the home institution for purposes of the distribution of federal financial aid to students in the Degree program, including the processing of veteran's educational benefits. SCC will charge to Degree program students the tuition rate reflected on Schedule 2 for all credits delivered in the Program. Moreover, SCC will be the only institution from which students in the Degree program will be able to obtain scholarships in addition to federal financial aid.

B. MSU's party specific obligations:

- 1. MSU will admit, for purposes of this Project, any student SCC admits to the Degree program pursuant to the mutually agreed to admissions criteria established by the parties. MSU will create the necessary tracking courses sufficient to facilitate the Degree program student's progress.
- 2. MSU will charge to SCC the tuition rate reflected on Schedule B, which shall be no more than its current tuition rate minus ten (10%) percent. MSU agrees to invoice SCC for all credit hours taken by students in the Degree program as indicated in Schedule 2. MSU agrees to work with SCC to the extent that SCC is unable to collect payment from Degree students. SCC should notify MSU of its failure to collect from a Degree student any amounts associated with courses conveyed by MSU. MSU will not collect from SCC any such amounts following notice from SCC.

**5. Entire Agreement.** This Amended Agreement, along with the Agreement form the entire agreement between the parties regarding the subject matter hereto. Should there be any conflict between this Amended Agreement and the Agreement, this Amended Agreement shall control. This Amended Agreement shall be signed on behalf of St. Charles Community College by Dr. Barbara Kavalier,

President of St. Charles Community College, and on behalf of Missouri State University by Clifton M. Smart, its President. This Amended Agreement shall be effective as of the date first written above.

**St. Charles Community College**

  
Dr. Barbara Kavalier  
President, St. Charles Community College

**The Board of Governors of  
Missouri State University**

  
Clifton M. Smart  
President, Missouri State University

## **Schedule 1**



St. Charles CC and  
MSU re Joint Degree

## Schedule 2

Degree: Bachelor of Applied Science Degree in Occupational Therapy Assistant

Diploma Issued Jointly: Missouri State University and St. Charles Community College

Total Degree Credit Hours: 120.

Institution: Missouri State University

Credit Allotment: 30

### Courses:

Course Name	Credit Hour	Tuition Rate
IPE 379 – Interprofessional Perspectives on Public Health	3	\$292
ipe 382 – Introduction to Health Insurance and Managed Care	3	\$292
MGT 340 – Principles of Management	3	\$305
BMS 599 – Health Literacy in the Human Services	3	\$292
CFD 532 – Family Advocacy	3	\$269
IPE 378 – Health Quality Management	3	\$292
SOC 341 – Medical Sociology	3	\$269

Degree students will be required to take nine (9) credit hours (3 courses) of general education courses (e.g. PSY 101, COM 110, and GenEd/Civics). The tuition rate for any general education course taken by a Degree student will be no more than \$292.

Institution: St. Charles Community College

Credit Allotment: 90

### Courses:

Course Name	Credit Hour
BUS 105 Business Ethics	3
EDU 247 Multicultural Education	3
ENG 102 English Comp II	3
GenEd/C42 Elective History of Disability & Marginalized Populations	3
MAT 147 Healthcare Statistics	3
OTA 425 Foundations of OTA Field Experience II	3
OTA 100 Intro to OTA Baccalaureate Project	1
OTA 200 Occupational Justice and Social Determinants of Health	3
OTA 200 Occupational Science	3
OTA 201 Applied A&P in Health & Disease	4
OTA 215 Functional Anatomy & Kinesiology	3

OTA 301	Foundations of Occupational Therapy	3
OTA 302	Baccalaureate Project	3
OTA 305	Foundations of OTA Theory I	5
OTA 311	Engaging in Occupation Across the Lifespan	3
OTA 312	OTA Portfolio	1
OTA 315	Foundations of OTA Practice I	3
OTA 325	Foundations of OTA Field Experience	2
OTA 402	Baccalaureate Project II	3
OTA 404	Baccalaureate Project III	2
OTA 405	Foundations of OTA Theory II	5
OTA 406	Foundations of OTA Theory III	5
OTA 407	OTA Capstone	2
OTA 412	OTA Portfolio II	1
OTA 415	Foundations of OTA Practice II	3
OTA 416	Foundations of OTA Practice III	3
OTA 426	Foundations of OTA Field Experience III	3
OTA 427	OTA Practicum I	4
OTA 428	OTA Practicum II	4
PSY 210	Human Growth & Development	3

Invoices will be sent to SCC after MSU's Change of Schedule Period has expired for the given semester. Such invoice shall be due and payable, subject to the Amended Agreement, within forty-five (45) days of receipt of the Invoice.

**Tab 13 Attachment E**  
**External Review Team Membership**

**Comprehensive External Review Team  
Occupational Therapy Assistant Phase II Proposal**

Name	Title	Institution
Amy Ackerson	Associate Dean of Allied Health	Missouri State University-West Plains
Tresa Ryan	Health Information Technology Program	Missouri State University-West Plains
Rhonda Hutton-Gann	Dean Allied Health	State Fair Community College
Janet Clanton	Dean of Instruction	State Technical College of MO
Aaron Kliethermes	Dean of Institutional Effectiveness, Assessment, and Extended Programs	State Technical College of MO
Cynthia Ballentine	OTA Program Director	St. Louis Community College
Leslie Vogan	Academic Fieldwork Coordinator	St. Louis Community College
Doug Koch	Vice Provost	Southeast Missouri State University
Jason Waggoner	Interim Chair of Kinesiology, Nutrition and Recreation	Southeast Missouri State University
Tracy McGrady	Provost & Vice Chancellor for Academic Affairs	Ozarks Technical Community College
Rebecca (Becky) Jenkins	OTA Program Director	Ozarks Technical Community College
Roger McMillian	Provost	Mineral Area College
Timothy Wolf	Chair of the Department of Occupational Therapy and Associate Professor	University of Missouri-Columbia
Stephanie Allen	Assistant Teaching Professor of Occupational Therapy	University of Missouri-Columbia
Roxanne Vandermause	Interim Dean and Donald L. Ross Endowed Chair for Advancing Nursing Practice	University of Missouri-St. Louis
Sue Lasiter	PhD Program Director and Associate Professor in the School of Nursing and Health Studies	University of Missouri-Kansas City
Suzanne Gochis	Vice Chancellor of Instruction and Chief Academic Officer	Metropolitan Community College
Amber Jenkins	Coordinator, Occupational Therapy Assistant Program	Metropolitan Community College

Missouri Department of Higher Education & Workforce Development  
301 W. High St., Suite 860  
PO Box 1469  
Jefferson City, MO 65102

Dear Coordinating Board for Higher Education,

The External Review Team has completed the review of the St. Charles Community College (SCCC) proposed Occupational Therapy Assistant (OTA) program expansion to include a Bachelor of Science degree in OTA. As stated in RSMo 163.191, community college offerings typically lead to certificates, diplomas, or associate degrees, and may include baccalaureate degrees when authorized by CBHE. SCCC is proposing the OTA program and the provided justifications meet the criteria outlined in the statutory process.

### **Recommendation**

The Review Team has conducted a review of the Phase II proposal, the accompanying supporting documents, and compared these with the criteria set out by the Missouri Department of Higher Education & Workforce Development (MDHEWD), State of Missouri House Bill 758, and the new Accreditation Council for Occupational Therapy Education (ACOTE) baccalaureate standards. After thorough review and discussion, the External Review Team reached consensus that an overwhelming majority of the requirements as established through statute and administrative rule were not met or were not fully met.

**Therefore, it is the Team consensus to not recommend the SCCC program expansion proposal for approval.**

A response to the public comments from SCCC was shared two days prior to this report's completion date. The response focused on the MOU with Missouri State and did not address the bulk of the concerns raised or those concerns expressed in this document.

Findings of the Review Team are summarized below according to criteria from each of the governing/accrediting bodies.

### **Analysis**

Administrative rule in [6 CSR 10-4.010](#)

**Evidence of good faith effort to explore the feasibility of collaboration with other institutions whose mission or service region encompasses the proposed program.**

**NOT MET:** 6 CSR 10-4.010 states that evidence of a good faith effort to explore the feasibility of collaboration with other institutions and that at a minimum, that will include letters from chief academic officers involved in exploring the feasibility and why collaboration is or is not feasible. The proposal submitted does not provide detail on what options were explored and why they were or were not feasible. The SCCC/Missouri State

University (MSU) MOU provided limited information on the collaboration and structure of the collaboration. Details that were addressed and concerns the review committee had include:

- A typical collaboration between two and four-year granting institutions is mutually beneficial, and the institutions offer portions of programs that align with their mission and focus. The proposal mentions MSU teaching only general education courses.
- MSU has ACOTE accreditation for its Master's in Occupational Therapy program. There is no mention of whether they would pursue OTA accreditation.
- Baccalaureate granting institutions in Missouri were willing to collaborate with SCCC. The proposals shows SCCC offering all content/discipline specific courses and the baccalaureate project.
- The proposal states that other collaboration would not meet the needs of students because ACOTE has an extensive waitlist for new accreditations. ACOTE changed their guideline and is no longer differentiating between applications for new programs and those for existing programs. Institutions are able to seek accreditation for new program accreditation in a timely manner.
- At the time of the proposal, there were no bachelor level OTA programs in the state, but there were four-year institutions with upper-level courses, the University of Missouri, a public institution, and Central Methodist University, a private institution.

**Evidence that the offering institution is contributing substantially to the 2014 CBHE's Blueprint for Higher Education pursuant to section 173.020(4), RSMo, and is committed to advancing the goals of that plan.**

1. Evidence of institutional capacity to launch the program in a high-quality manner, including: An external review conducted by a team including faculty experts in the discipline to be offered and administrators from institutions already offering programs in the discipline and at the degree level proposed. The review must include an assessment of the offering institution's capacity to offer the new program in terms of general, academic, and student service support, including faculty resources that are appropriate for the program being proposed (e.g. faculty credentials, use of adjunct faculty, and faculty teaching workloads);

**NOT FULLY MET:** The institution's capacity to offer the new program was not sufficiently demonstrated in the proposal. The SCCC Proposal states that SCCC has four full-time faculty and two adjunct faculty. Two of the full-time faculty have a "minimum of a master's degree." Details were not provided to link the faculty with the credential and the expectations for teaching, faculty workload and faculty support information was not provided. Information on student services or other areas that may need additional resources due to expansion of a different degree level was not provided.

2. A comprehensive cost/revenue analysis summarizing the actual costs for the program and information about how the institution intends to fund and sustain the program.

**NOT MET:** The financial capacity and documentation of financial projections did not focus on the institution's ability to meet that need. The primary financial emphasis addressed the cost of tuition for the students and how attending a program at the community college would be more cost effective to the students. It does not address the additional costs needed for dedicated faculty or additional resources needed to support the baccalaureate degree. There are no projected enrollments for the baccalaureate program and associated revenue/expense data. There is mention of the purchase of a new building which adds additional rooms, labs, and office space but no specifics were offered regarding capacity or budget needs to support the facilities and program.

3. Evidence indicating there is sufficient student interest and capacity to support the program, and, where applicable, sufficient capacity for students to participate in clinical or other external learning requirements, including library resources, physical facilities, and instruction equipment;

**NOT FULLY MET:** A market analysis firm (report provided as additional materials) conducted an analysis of student interest, community need, including a number of active job listings and workforce need, and adequate facilities and clinical partners. The market analysis supported the need for OTA graduates and the growing employment opportunities. The report did not address the need for the bachelor's degree and that employers are currently demanding that degree level. Student interest was briefly addressed as SCCC provided survey data that 100% of former graduates who responded would have sought a bachelor's degree and that 92% of the respondents strongly agree they would enroll in a bachelor's completion option. The number of respondents was not provided.

4. Where applicable, a description of accreditation requirements for the new program and the institution's plans for seeking accreditation

**NOT MET:** ACTOE accreditation at the baccalaureate level requires that students "demonstrate the ability to synthesize in-depth knowledge in a practice area through the development and completion of a baccalaureate project in one or more of the following areas: clinical practice skills, administration, leadership, advocacy, and education." The proposal does not make it clear that SCC will meet the ACOTE criteria or provide details on the baccalaureate project.

At this time SCCC does not have regional accreditation from the Higher Learning Commission (HLC) to offer a bachelor's degree which would be a pre-requisite to seeking professional accreditation.

**Evidence that the proposed program is needed, including:**

1. Documentation demonstrating that the program does not unnecessarily duplicate other programs in the applicable geographic area, as described in subsection (9)(C) of this rule;

**NOT MET:** In the proposal, the Market Report conducted by River Henge Partners LLC states that: "throughout Missouri's Occupational Therapy Spectrum, there are sixteen colleges, universities and technical schools that are focused on OTA programming."

Their report mentioned nine accredited through ACOTE and three programs in the St. Louis region. The proposal did not detail the need for additional programming in the region or that current programs do not have the capacity to meet the regional need.

2. A rigorous analysis demonstrating a strong and compelling workforce need for the program, which might include data from a credible source, an analysis of changing program requirements, the current and future workforce, and other needs of the state, and letters of support from local or regional businesses indicating a genuine need for the program

**NOT MET:** The OT profession continues to support the associate degree as the entry level; currently there are no OTA baccalaureate degree graduates. Workforce data from AOTA still support 2-year entry. Workforce data in the proposal support the need for OTAs but not specifically the need for baccalaureate prepared OTAs.

3. A clear plan to meet the articulated workforce need, including:

a. Aligning curriculum with specific knowledge and competencies needed to work in the field(s) or occupation(s) described in the workforce need analysis in part (II) of this subparagraph

**NOT MET –** Course titles and curriculum design were provided by SCCC. Comparison of ACOTE standards with course objectives was not provided; therefore it was not possible to determine curriculum alignment to competencies or workforce needs.

b. Providing students with external learning experiences to increase the probability that they will remain in the applicable geographic area after graduation

**NOT MET –** Descriptions of learning experiences and partnerships combined with workforce data did not indicate the probability that students would be able to obtain employment in their geographical area. Further, it was unclear if the letters of support were related to the bachelor's project and fieldwork required for the baccalaureate degree.

c. A plan for assessing the extent to which the new program meets that need when implemented

**NOT MET –** No plan for assessing whether the new program meets current needs was provided. However, SCCC did attempt to make a case for the need of the bachelor's degree (see section on need). It is implied that obtaining and sustaining AOTA accreditation would ensure quality but whether needs are being met is not explicitly addressed.

If you have questions regarding our review, please contact Zora Mulligan, Commissioner of Higher Education, Missouri Department of Higher Education & Workforce Development.

Thank you for the opportunity to review this program expansion proposal.

## Comprehensive Review Table of Elements

Criteria	Excerpt of SCCC Evidence	Team Response
<b>Elements of a Complete Proposal for Comprehensive Review 6 CSR 10-4.010. A complete proposal includes the following:</b>		
<p>Evidence of good faith effort to explore the feasibility of collaboration with other institutions whose mission or service region encompasses the proposed program. Include letters from the chief academic officers of both the proposing institution and other institutions involved in exploring the feasibility of collaboration attesting to the nature of the discussions and explaining why collaboration in this instance is not feasible.</p>	<p>Collaboration with other institutions to bridge from OTA to an OT is unavailable.</p> <p>When asked, public universities were unwilling to provide documentation citing a lack of bachelor-level OTA coursework. The absence of upper-level, ACOTE-approved OTA coursework precludes institutions from offering a bachelor-level degree in OTA. At this time, universities in the state of Missouri are ineligible to offer a Bachelor's in Applied Science for OTA; the next availability for new program review is 2023.</p> <p>Given this fact and the realities of new program approval by the Accreditation Council for Occupational Therapy Education (ACOTE) that are outlined in our proposal, collaboration and articulation are not possible now nor would they be for many years.</p> <p>" ... collaboration with a university is not feasible or the approach is not a viable means of meeting the needs of students and employers ... "</p> <p>The bulk of the coursework in the degree, including all OTA coursework, will occur at SCC; MSU may provide faculty in person at SCC or online for the delivery of general education course offered by MSU;</p>	<p><b>NOT MET.</b></p> <p>The proposal submitted does not provide detail on what options were explored and why they were or were not feasible. The SCCC/Missouri State University (MSU) MOU provided limited information on the collaboration and structure of the collaboration. Details that were addressed and concerns the review committee had include</p> <ul style="list-style-type: none"> <li>• A typical collaboration between two and four-year granting institutions is mutually beneficial, and the institutions offer portions of programs that align with their mission and focus. The proposal mentions MSU teaching only general education courses.</li> <li>• MSU has ACOTE accreditation for its Master's in Occupational Therapy program. There is no mention of whether they would pursue OTA accreditation.</li> <li>• Baccalaureate granting institutions in Missouri were willing to collaborate with SCCC. The proposal shows SCCC offering all content/discipline specific courses and the baccalaureate project.</li> <li>• The proposal states that other collaboration would not meet the needs of students because ACOTE has an extensive waitlist for new accreditations. ACOTE changed their guideline and is no longer differentiating between applications for new programs and those for existing programs. Institutions are able to seek</li> </ul>

		<p>accreditation for new program accreditation in a timely manner.</p> <p><a href="https://acoteonline.org/policy-changes-december-2019/">https://acoteonline.org/policy-changes-december-2019/</a></p> <ul style="list-style-type: none"> <li>At the time of the proposal, there were no bachelor level OTA programs in the state, but there were four-year institutions with upper-level courses, the University of Missouri, a public institution, and Central Methodist University, a private institution.</li> </ul>
<b>Evidence that the offering institution is contributing substantially to the CBHE's Blueprint for Higher Education</b> as adopted on February 4, 2016, pursuant to section 173.020(4), RSMo, and is committed to advancing the goals of that plan;		
<p>Evidence of institutional capacity to launch the program in a high-quality manner, including:</p> <ul style="list-style-type: none"> <li>An external review conducted by a team including faculty experts in the discipline to be offered and administrators from institutions already offering programs in the discipline and at the degree level proposed. The review must include an assessment of the offering institution's capacity to offer the new program in terms of general, academic, and student service support, including faculty resources that are appropriate for the program being proposed (e.g. faculty credentials, use of adjunct faculty, and faculty teaching workloads);</li> </ul>	<p>SCC currently offers an Associate of Applied Science in OTA. There exists the faculty interest and expertise to expand to include an OTA Bachelor's Degree program. This interest aligns with newly released recommendations for professional educational standards.</p> <p>ACOTE standards for faculty numbers and composition for bachelor-level OTA programs must have at least three full-time faculty, 50% of whom must hold a minimum of a master's degree. SCC currently has four fulltime and two adjunct faculty. Among the full-time faculty, 50% hold a minimum of a master's degree. The faculty at SCC possess a wide clinical and academic background and have been approved by ACOTE.</p> <p>The OTA program now has four full-time and two (core) adjunct faculty to accommodate changes to the curriculum and projected growth of an additional student cohort. Faculty have varying and diverse content specialties. The Program Director has been working with and mentoring all faculty on curriculum development, course design, and content implementation. Additionally, one of our administrative assistants has been reclassified and has been given the opportunity for</p>	<p><b>NOT FULLY MET.</b></p> <p>The institution's capacity to offer the new program was not sufficiently demonstrated in the proposal. The SCCC Proposal states that SCCC has four full-time faculty and two adjunct faculty. Two of the full-time faculty have a "minimum of a master's degree." Details were not provided to link the faculty with the credential and the expectations for teaching, faculty workload and faculty support information was not provided. Information was not provided on how the existing faculty would be able to manage the increased requirements, courses, and students of an added degree level. The Information on student services or other areas that may need additional resources due to expansion of a different degree level was not provided.</p>

	<p>professional development in the areas of clinical records and data collection. We also have allied health counselors on-site to facilitate student enrollment, retention, and student success through an embedded advising model. All of these additions have allowed the OTA department to grow and develop in accordance with our strategic plan and college mission and philosophy and position our program well to develop and implement bachelor's level curriculum.</p>	
<ul style="list-style-type: none"> <li>• A comprehensive cost/revenue analysis summarizing the actual costs for the program and information about how the institution intends to fund and sustain the program;</li> </ul>	<p>"Missouri will rank among the 10 most affordable states in which to obtain a postsecondary degree or certificate by 2025."</p> <p>The average college debt among student loan borrowers in America is \$32,731, according to the Federal Reserve. This is an increase of approximately 20% from 2015-2016. Most borrowers have between \$25,000 and \$50,000 outstanding in student loan debt. Nevertheless, more than 600,000 borrowers in the country are over \$200,000 in student debt, and that number may continue to increase.</p> <p>Missouri currently ranks 32nd nationally with 58% of Missourians having an average of \$27,108 in student loan debt. The average student loan debt of an SCC-OTA program graduate is \$2000.</p> <p>In comparison, the following estimates outline the cost of a bachelor's-level degree (or 120 credit hours) at regional institutions.</p> <p>Despite statewide budget restrictions, the Dean of Nursing and Allied Health along with the administration of St. Charles Community College</p>	<p><b>NOT MET.</b></p> <p>The financial capacity and documentation of financial projections did not focus on the institution's ability to meet that need. The primary financial emphasis addressed the cost of tuition for the students and how attending a program at the community college would be more cost effective to the students. It does not address the additional costs needed for dedicated faculty or additional resources needed to support the baccalaureate degree. There are no projected enrollments for the baccalaureate program and associated revenue/expense data. There is mention of the purchase of a new building which adds additional rooms, labs, and office space but no specifics were offered regarding capacity or budget needs to support the facilities and program.</p>

	<p>are good financial stewards and consistent advocates for the OTA program. The OTA budget was expanded this year to address several needs including additional faculty to accommodate curriculum updates, changes, and course development. Additional funding was also granted for professional development, innovation and technology, and supplies for curriculum adjustments.</p> <p>SCC purchased the building at# 1 Academy Place Dardenne Prairie, MO 63368 in February 2017. After the purchase, administration provided the OTA department with increased lab space including a simulated lab for OTA. As a result of the need for growth and potential to expand the OTA program, the following shared spaces for allied health students were developed: computer lab, simulated central supply, and competency skills practice rooms. Semi-private faculty office space was also added to accommodate the increase in OTA faculty. The program director has a private office, and there are multiple private areas for counseling students when needed.</p>	
<ul style="list-style-type: none"> <li>Evidence indicating there is sufficient student interest and capacity to support the program, and, where applicable, sufficient capacity for students to participate in clinical or other external learning requirements, including library resources, physical facilities, and instruction equipment</li> </ul>	<p><b>Student Interest and Community Support</b></p> <p>St Charles Community surveyed former graduates of the OTA program and asked if a bachelor's degree was offered at the time they enrolled, would they have sought a bachelor's degree. 100% of the respondents replied strongly agree on a Likert scale of strongly disagree to strongly agree. 92% of the respondents replied strongly agree that they would enroll in a post-professional or bachelor's completion option for students who already graduated from SCC.</p>	<p><b>NOT FULLY MET.</b></p> <p>A market analysis firm (report provided as additional materials) conducted an analysis of student interest, community need, including a number of active job listings and workforce need, and adequate facilities and clinical partners. The market analysis supported the need for OTA graduates and the growing employment opportunities. The report did not address the need for the bachelor's degree and that employers are currently demanding that degree level. Student interest was briefly addressed as SCCC provided survey data that 100% of former graduates who responded would have sought a bachelor's degree and that 92% of the respondents strongly agree</p>

		they would enroll in a bachelor's completion option. The number of respondents was not provided.
<ul style="list-style-type: none"> <li>Where applicable, a description of accreditation requirements for the new program and the institution's plans for seeking accreditation; and</li> </ul>	<p>ACOTE developed a set of baccalaureate project standards to address the growing educational demands of the profession and to encourage the development of community and industry partnerships to meet the educational needs of the students and enhance workforce demands.</p> <p>The Baccalaureate Project is designed to provide an in-depth experience in one or more of the following: 1) Clinical practice skills, 2) Administration, 3) Leadership, 4) Advocacy 5) Education. This project allows the students to demonstrate the application of knowledge gained that distinguishes them as bachelors prepared practitioner who can meet the growing demands of the workforce.</p> <p>"Level II fieldwork in the emerging practice fields of wellness and community health (WCH) stands out as a natural means to accomplish this goal; embedding a wellness and prevention service component into traditional fieldwork settings could also provide students with experience and in-demand skills. It is well known that students are often offered therapy positions at sites where they have completed traditional fieldwork (Rodger et al., 2007). In nontraditional fieldwork settings, some occupational therapy positions have been created in response to sites' experiences with occupational therapy students in fieldwork and service learning opportunities (Munoz, Provident, &amp; Hansen, 2004). The development of prevention-focused fieldwork could be a win-win approach. The students who have this experience will gain new knowledge and perspectives that are relevant to practice regardless of the setting. Additionally, the sites in which they work would become more</p>	<p><b>NOT MET.</b></p> <p>ACOTE accreditation at the baccalaureate level requires that students "demonstrate in-depth knowledge in a practice area through the development and completion of a baccalaureate project in one or more of the following areas: clinical practice skills, administration, leadership, advocacy, and education." The proposal does not make it clear that SCCC will meet the ACOTE criteria or provide details on the baccalaureate project.</p> <p>At this time SCCC does not have regional accreditation from the Higher Learning Commission (HLC) to offer a bachelor's degree which would be a pre-requisite to seeking professional accreditation.</p>

	<p>aware of what occupational therapy has to offer and how it benefits their current services. As fieldwork introduces each incoming class of therapists to practice, there should be increased availability of occupational therapy positions in WCH services."</p>	
<p><b>Evidence that the proposed program is needed, including:</b></p> <ul style="list-style-type: none"> <li>Documentation demonstrating that the program does not unnecessarily duplicate other programs in the applicable geographic area, as described in subsection (9)(C) of this rule;</li> </ul>	<p>" ... doing so would not unnecessarily duplicate an existing program ... " At this time, no institution in the state of Missouri offers a baccalaureate degree in OTA.</p> <p>Of forty-three (43) higher education schools offering degrees and programming that reach throughout Missouri's Occupational Therapy Spectrum, there are sixteen (16) colleges, universities and technical schools that are focused on OTA programming. However, within the sixteen (16), there are only nine (9) unique active OTA programs accredited through ACOTE, of which two (2) are private schools. A Consortium of schools accounts for one (1) unique active program but represents seven (7) advertised programs. Three (3) of the nine (9) unique OTA programs are in the St. Louis Region, including St. Charles Community College.</p>	<p><b>NOT MET.</b></p> <p>In the proposal, the Market Report conducted by River Henge Partners LLC states that: "throughout Missouri's Occupational Therapy Spectrum, there are sixteen colleges, universities and technical schools that are focused on OTA programming." Their report mentioned nine accredited through ACOTE and three programs in the St. Louis region. The proposal did not detail the need for additional programming in the region or that current programs do not have the capacity to meet the regional need.</p>
<ul style="list-style-type: none"> <li>A rigorous analysis demonstrating a strong and compelling workforce need for the program, which might include data from a credible source, an analysis of changing program requirements, the current and future workforce, and other needs of the state, and letters of support from local or regional businesses indicating a genuine need for the program; and</li> </ul>	<p>According to the "2018 Current Trends in accreditation and Higher Education" presentation by AOTA on April 19, 2018, the US Bureau of Labor Statistics indicates that Occupational Therapy Assistants is the 15th fastest growing occupation in the US, with predicted Job Growth from 2016-2026 equaling &gt;28%. The results of the OTA Missouri Marketplace Engagement Study supports a rapid progression of industry adoption. The Study results suggested the two industries within healthcare experiencing the most opportunity for COTA placement are the skilled nursing and home health industries. Furthermore, interview respondents indicated that there are multiple</p>	<p><b>NOT MET.</b></p> <p>Clear that the OTA profession still supports 2-year entry and there are currently no 4-year degree OTA graduates.</p> <p>Workforce data from AOTA still support 2-year entry.</p> <p>Workforce data in proposal support need for OTAs but not specifically a 4-year degree.</p> <p>No Missouri OTA job postings that indicate requirement or preference for a baccalaureate degree.</p>

	<p>driving factors. These include change in regulations, which expanded responsibilities of the OTA, shift in direct patient care by the OT into a purely administrative and oversight role leaving the OTA in an even more essential position as the primary patient care provider, and shift in insurance billing (PTPM) which affects the billed time and company reimbursement processes.</p> <p>During the Study, the data research firm found ninety (90) active job listings referencing key words “OTA”, “COTA”, and “Occupational Therapy Assistants”. Forty-one (41) companies posted listings including health systems, home health, skilled nursing, acute and inpatient care, medical spas, rehabilitation centers, psychiatric centers and Professional Management companies. Twenty-one (21) companies were selected to provide job position sampling and marketplace feedback. Twelve (12) confirmed OT use as part of their healthcare protocol. Eight (8) companies responded with contextual feedback.</p> <p>Industry is pushing for additional education and experience to provide a base to increase OTA responsibility and to bridge the knowledgebase divide between OT's and OTA's.</p>	
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**A clear plan to meet the articulated workforce need including:**

<ul style="list-style-type: none"> <li>Aligning curriculum with specific knowledge and competencies needed to work in the field(s) or occupation(s) described in the workforce need analysis in part (II) of this subparagraph;</li> </ul>	<p>The OTA Program respects students as adult learners and supports their growth through a multifaceted approach in the curriculum design. Teaching approaches use didactic instruction, experiential learning, professional collaboration, community engagement, technology, and cultivation of clinical reasoning. Faculty facilitate the development of role competencies. The curriculum is grounded in this philosophy and is based on the programs graduate outcomes.</p>	<p><b>NOT MET.</b></p> <p>Course titles and curriculum design were provided by SCCC. Comparison of ACOTE standards with course objectives was not specifically provided therefore it was not possible to determine curriculum alignment to competencies or workforce needs.</p>
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	<p>The use of these three roles and methods in conjunction with the OT Practice Framework, Standards of Practice for Occupational Therapy, ACTA Fieldwork Evaluation, ACOTE standards, and Knowles' Principles of Androgyny serve as organizing framework in determining and facilitating the knowledge, skills, or attitudes necessary to establish entry-level competency for the OTA practitioner. The following outcomes provide a guide for the knowledge, skills, and attitudes needed to engage in each role of the OTA:</p> <ol style="list-style-type: none"> <li>1. Demonstrate the knowledge, skills, and attitudes to successfully fulfill the demands of each role.</li> <li>2. Consistently engage in effective communication and interpersonal skills.</li> <li>3. Establish appropriate teaching-learning competencies that apply to diverse audiences</li> <li>4. Demonstrate the ability to serve as an advocate for various populations, facilities, communities, institutions, and the profession of Occupational Therapy.</li> <li>5. Demonstrate the ability to effectively collaborate with an interdisciplinary team.</li> <li>6. Demonstrate a broad scope of knowledge of the ethical, legal, regulatory, and professional codes that inform the practice of Occupational Therapy.</li> <li>7. Develop the ability to apply and use technology and resources to support evidence-based practice.</li> </ol>	
<ul style="list-style-type: none"> <li>• Providing students with external learning experiences to increase the probability that they will remain in the applicable geographic area after graduation; and</li> </ul>	<p>With nearly 400,000 residents, a well-trained healthcare workforce is vital to our region and is one of the top priorities for the county.</p> <p>The private-sector field-work partners are willing to engage students as part of the learning</p>	<p><b>NOT MET.</b></p> <p>Learning experiences and partnerships described, combined with the workforce data, did not indicate probability students will be able to obtain employment in their geographical area. Further, it was unclear if the letters of support were related to capstone experiences</p>

	<p>environment which creates placement opportunities throughout the St. Louis Metro and Missouri</p> <p>Based on SCC-graduate surveys, 94% of students graduating from the OTA program are employed in their field within six months of graduation and board certification. Employer and student surveys show 95-100% satisfaction with program learning, employment status, and demonstration of work performance.</p> <p>Students who become future OTA practitioners in the state of Missouri will best serve the evolving health care needs in our region with the additional education a bachelor's of OTA degree will provide. Many legislative and educational bodies recognize that rural counties are among the fastest-growing groups and account for a growing portion of the state's population, including working adults, low-income, and first-generation students who are all in need of additional quality education and essential job skills to meet workforce needs. The service area of SCC encompasses several of these rural counties and vulnerable communities.</p> <p>St. Charles Community College OTA program has clinical contracts with a variety of clinical, non-clinical, and community-based organizations. These settings allow students to participate in clinical partnerships and practice in both traditional and emerging areas of practice. Embedded in our curriculum are also faculty-led fieldwork opportunities where students and faculty work with community partners to develop and enhance their current offerings and to provide students with progressive participation as they develop competency skills. Both Level I and Level II Faculty-Led Fieldwork rotations are available at</p>	<p>which are required for the BS in addition to fieldwork.</p>
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	an Adult Dementia Specific Day Program, Community Mental Health Day Program, and at a Child Development Center (ages 3 months-5 years).	
<ul style="list-style-type: none"> <li>• A plan for assessing the extent to which the new program meets that need when implemented.</li> </ul>		<p><b>NOT MET.</b></p> <p>A plan for assessing whether the new program meets current needs was not provided. The proposal attempted to make a case for the need of the bachelor's degree (see section on need). It is implied that obtaining and sustaining AOTA accreditation would ensure quality and needs being met but that is not explicitly stated.</p>

Addendum:

The External Review Team has completed the review of the St. Charles Community College (SCCC) proposed Occupational Therapy Assistant (OTA) program expansion to include a Bachelor of Applied Science degree in OTA.

After reviewing the amended Memorandum of Understanding between SCCC and Missouri State University, the External Review Team finds that the information presented in the updated MOU does not change the initial response of the review team.

As such, the review team maintains its finding that an overwhelming majority of the requirements as established through statute and administrative rule were not met or were not fully met.

External Review Team  
September 4, 2020



August 18, 2020

Zora Mulligan  
Commissioner of Higher education  
Missouri Department of Higher Education & Workforce Development  
205 Jefferson St., 11th floor, P.O. Box 1469  
Jefferson City, Missouri 65102

Re: Response to St. Charles Community College, Occupational Therapy Assistant (OTA) Program Proposal

Dear Commissioner Mulligan,

Thank you for the opportunity to respond to and address the proposal submitted by St. Charles Community College (SCCC) to offer an Occupational Therapy Assistant (OTA) bachelor's degree. We recognize the important work and services St. Charles Community College (SCCC) has provided for their constituents and the state since their establishment in 1986. They hold HLC accreditation to offer associate level degrees and certificates, as well as specialized accreditations in programs, including accreditation for Occupational Therapy Assistant from the Accreditation Council for Occupational Therapy Education (ACOTE) of the American Occupational Therapy Association (AOTA). SCCC is serving a workforce need for OTA's and their placement rates, board pass rates, and employer satisfaction data support the success in meeting that need.

Our primary concerns related to SCCC offering a bachelor's degree in OTA stems from the RSMo 163.191 statutory requirements for which a community college can offer baccalaureate degrees or applied bachelor's degrees. Several of these concerns were raised during the initial submission of the proposal and have not sufficiently been addressed in the current proposal. RSMo 163.191 outlines the following conditions:

- the level of education required in a field for accreditation or licensure increases to the baccalaureate degree level, or
- in the case of applied bachelor's degrees, the level of education required for employment in a field increases to that level, and
- when doing so would not unnecessarily duplicate an existing program
- collaboration with a university is not feasible or the approach is not a viable means of meeting the needs of students and employers

- the institution has the academic and financial capacity to offer the program in a high-quality manner

The majority of these requirements have not been met as outlined below.

#### **Increased educational requirements for accreditation or licensure**

In 2019, the Accreditation Council for Occupational Therapy Education (ACOTE), an independent associated advisory council of the Executive Board of the American Occupational Therapy Association (AOTA) did add baccalaureate accreditation criteria for the OTA program but did not change the entry-level requirements to the bachelor's degree. Both the associate's and bachelor's degrees meet entry-level requirements and students completing an associate's degree can enter the labor market and sit for the same licensing examination.

#### **Increased level of education for employment**

The proposal presented does not convincingly demonstrate that employers are requiring a higher level of education. The high placement rates mentioned in the proposal as well as the high employer satisfaction level, indicate the current program and degree level is fulfilling the workforce and employer needs. The high pass rates of the licensure exam also indicate that the current associate's degree program and similar programs across the state, are effectively meeting the needs and students are successfully attaining licensure.

#### **Would not unnecessarily duplicate an existing program.**

When SCCC originally proposed the OTA baccalaureate program, it would have been the only one in the state. With that said, the accreditation standards for the bachelor's level were just recently established and other institutions were considering addressing those changes as well. Since that time, the Coordinating Board approved the University of Missouri – Columbia's request to offer a bachelor's degree in OTA. The University of Missouri – Columbia is approved by HLC to offer bachelor level degrees and will not require substantive change approval from HLC. SCCC will require approval from HLC to offer degrees at the baccalaureate level. This was not addressed in the proposal nor was an anticipated timeline for the process provided.

There are currently sixteen programs throughout the state offering some type of OTA programming. Nine of those programs are ACOTE accredited. Data collected by MDHEWD on 11 of the institutions granting associate level OTA degrees, show that in academic year 2018-2019 there were 372 students enrolled across those programs and 151 completers that year. The proposal did not address whether SCCC's program and current programs in the state have the capacity to meet current student and employer demand. Information on how a bachelor's degree would specifically meet capacity needs was not specifically addressed.

#### **Collaboration with a university is not feasible**

The proposal states that collaboration with a four-year institution is not possible because no four-year

institution is offering a bachelor's degree in OTA and therefore no upper level courses exist. Collaborative opportunities were offered to SCCC and upper level courses do exist as part of existing bachelor's level OT programs, health studies programs, and the recently approved OTA program offered by MU. The proposed collaboration with Missouri State University (MSU) is unclear but appears to allow for only the teaching of general education courses by MSU. Apart from being able to teach the general education courses on the SCCC campuses, this is the same opportunity offered all state institutions as a component of CORE42.

### **The institution has the academic and financial capacity**

The financial capacity and documentation of financial projections does not focus on the institution's ability to effectively offer and sustain the proposed program. The primary financial emphasis addresses the cost of tuition for the students and how attending a program at the community college would be more cost effective for the students. It does not address the additional costs needed for dedicated faculty and additional support or expenses needed to support the baccalaureate degree requirements. There are no projected enrollments for the baccalaureate program and associated revenue/expense data.

### **Summary**

In order for a community college to offer a bachelor's degree, the statutory criteria must be met. The accreditation requirements have not changed to require a bachelor's degree for licensure but instead now allows for dual entry into OTA and licensure. Evidence of the employment demand for OTA's shows strong growth over the next several years, but there is no compelling evidence that employers are requiring a baccalaureate degree. The proposed collaboration is limited in its scope and does not capitalize on the inherent strengths each institution provides to their students and their constituents. The proposal lacks information regarding the institution's capacity to support and sustain a bachelor's level OTA program. For these reasons, we oppose the proposal and recommend that the Coordinating Board of Higher Education not approve the degree.

Thank you for the opportunity to provide comments on this phase II proposal. Please feel free to let me know if you have any questions regarding any of the information presented in this letter. We look forward to the upcoming Coordinating Board of Higher Education meetings on this matter.

Sincerely,



Mike Godard, Ph.D.  
Provost  
Southeast Missouri State University

Cc: Dr. Carlos Vargas, President



August 18, 2020

Zora Mulligan, Commissioner of Higher Education  
Missouri Department of Higher Education and Workforce Development  
301 W. High Street  
P.O. Box 1469  
Jefferson City, MO 65201-1469

Commissioner Mulligan,

This letter is in response to the request for public comment regarding the St. Charles Community College's (SCCC) Phase II proposal to offer a bachelor's degree in Occupational Therapy Assistant (OTA). We continue to have serious concerns that this proposal does not meet the statutory requirements for community college bachelor's degrees, and we recommend that it not be approved.

We do not oppose community college bachelor's degrees altogether. We provided a letter indicating support for the respiratory therapy proposals put forward by Ozark Technical College (OTC) and St. Louis Community College (STLCC). When the relevant criteria are met, allowing community colleges to offer bachelor's degrees can be an efficient way to provide critical programs. When the criteria are not met, they can undermine the effectiveness of higher education in our state.

**The level of education required for licensure or employment in the field has not increased to the baccalaureate level.**

As the Department concluded in September 2019, the criterion that the level of education required for licensure increase to the baccalaureate level has not been met (Attachment A). Additionally, the workforce analysis included with the Phase II proposal does not support the claim that the level of education required for employment in the field has increased.

**Level of education required for licensure**

The American Occupational Therapy Association (AOTA) and the Accreditation Council for Occupational Therapy Education (ACOTE) have indicated that they do not believe that a bachelor's degree could or should be required for licensure as an occupational therapy assistant. The profession's dual entry-point is a very recent development, and neither AOTA nor ACOTE has indicated that the profession will move toward a single entry-point in the near or distant future. SCCC's Phase II proposal prematurely assumes the future adoption of a policy before the evidence exists to support that conclusion. This is in contrast to the respiratory therapy case, where the policy is clear.

**Level of education required for employment**

UM does not dispute SCCC's market analysis conducted by River Henge Partners, LLC., but it does not provide any indication that Missouri employers are planning to

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*require* bachelor's degrees for employment as an occupational therapy assistant. Receiving licensure remains the paramount consideration, something that can still be achieved through the two-year degree.

The market analysis actually confirms the opposite: That SCCC stands better positioned to support workforce development and the *Blueprint for Higher Education* by focusing on its current two-year degree. With the profession growing substantially in the coming years and OTA positions offering above average salaries, OTA represents a career path that can provide Missourians with a high-paying job in a short period of time. Community colleges are well-positioned to thrive within their current mission of granting two-year degrees.

**This program would unnecessarily duplicate an existing program.**

The Coordinating Board approved the University of Missouri – Columbia's (MU) four-year OTA degree in November 2019. MU opened admissions for its program this month for a cohort that will start in August 2021. The main document included in SCCC's Phase II proposal has not been updated in over year and as a result fails to account for this and other important changes. For example, the process for securing a position to submit a candidacy application to transition an existing OTA program has changed, and SCCC's existing program will no longer provide the institution with preferential consideration. The soonest SCCC could begin offering the degree to students would be Fall 2024, per [ACOTE's new policy](#).

As highlighted in the preceding section, demand for a bachelor's degree in the profession is uncertain, particularly when SCCC's two-year option remains an excellent value for students looking to jump straight into the workforce. MU will serve as a case study for the state and enable us to answer important questions with greater certainty than we can at this time concerning the actual scope and statewide distribution of student and employer demand for this specific bachelor's degree.

Any immediate workforce need can be met immediately through a stackable credential style collaboration that draws entirely on existing resources. MU currently has a fully online Bachelor of Health Science (BHS) program with an emphasis in Occupational Therapy that is well-suited to serve SCCC students. Students would complete SCCC's existing, high-quality two-year program, earn their OTA licensure, and complete the MU BHS within two-years. In addition to enhancing these students' qualifications as an OTA, completion of this versatile program would enable students to pursue a broader arrange of career paths beyond occupational therapy or to seamlessly matriculate to graduate studies.

**(3) Collaboration is feasible, but the ambiguity around feasibility remains a concern.**

SCCC's proposal indicates that a collaboration is not feasible, which both fails to account for its plans with Missouri State University as well as the noted possibility of a collaboration with MU.

What does it mean for a collaboration to be feasible, and who makes that determination? Allowing a two-year institution to be the sole arbiter of what makes a collaboration feasible creates a clear moral hazard. Two-year institutions stand to benefit internally from offering

baccalaureate degrees, while the negative consequences of doing so are experienced externally in the form of inefficiencies, duplication, and mission creep. For similar reasons, prospective four-year partners should not be the sole arbiter, either. Rather, both prospective partners should have a voice at the table, and a set of common criteria should be developed to guide the discussions.

Several ideas for common criteria have been developed collaboratively and through an iterative process by the four-year Chief Academic Officers and shared with the department on June 4, 2020, as a starting point. This includes ensuring that collaborative agreements be mutually beneficial to both institutions, that some guardrails be in place to acknowledge four-year institution's existing expertise, and that efficient use of state resources be a priority.

It is difficult to assess the efficiency of this proposal, as neither the Phase I nor the Phase II proposal provide "a comprehensive cost/revenue analysis summarizing the actual costs for the program and information about how the institution intends to fund and sustain the program," despite this being a requirement for Phase I proposals outlined in the Department's *Plan for Comprehensive Review of Academic Program Proposals* (Attachment B). At a minimum, SCCC should be required to submit a budget at least as rigorous, if not more so, as new programs slated for routine review are required to do, allowing the CBHE to make an informed decision about the efficiency of this proposal relative to other possibilities.

#### **(4) The details regarding the collaboration with MSU are unclear.**

In addition to updating the preliminary proposal to highlight that a collaboration not only feasible but planned, SCCC and MSU should provide more detailed information regarding the nature of the collaboration beyond the MOU included provided in the materials for March 2020 CBHE meeting. Just as the initial approvals of a community college bachelor's degree will have outsize impact due to their precedent setting power, so too are any initial collaborations that come out of this process and was is deemed acceptable.

The degree plan included in the Phase II proposal should specify which institutions will offer which courses, who will provide the faculty members, and other details pertinent to how the various details of the MOU will be implemented in practice. Other elements that have been left unaddressed include but are not limited to:

- The organizational structure / governing plan for the program (i.e., day-to-day decision-making, resolution of academic issues, etc.)
- Admissions requirements for the collaborative program
- Assignment of program faculty and faculty reporting lines
- Use of distance technologies for instruction, advising, etc.
- Delineation of intellectual property issues relative to curriculum and scholarship
- Portability of student assistantships, stipends and financial aid
- Division of programmatic income and expenses

At the August 4 CBHE meeting, it was indicated that the full scope of the collaboration would be made clear at the September CBHE meeting, at which point the proposal will be voted on. This is an inadequate approach that gives neither the CBHE nor Missouri's public institutions of higher education the opportunity to fully consider and debate the nature and appropriateness of

the proposal. There is no reason for a matter of such importance to be decided with incomplete information.

## **Conclusions**

Unlike Ozark Technical College and St. Louis Community College's proposals to offer bachelor's degrees in Respiratory Therapy, St. Charles Community College's Phase II proposal a bachelor's degree in Occupational Therapy Assistant does not meet the criteria outlined in state statute. There have been significant changes in the programmatic landscape, as well as in ACOTE policy, since SCCC submitted its original proposal, which has been re-submitted for the purposes of the Phase II proposal. As a result, many of the claims made in the proposal are no longer accurate and out-of-date.

The proposal fails to demonstrate that the level of education required for either licensure or employment has increased to the baccalaureate level, does not account for the progress of MU's CBHE-approved program in the same area, and provides incomplete information regarding the proposed collaboration with Missouri State University. We strongly oppose the proposal and ask that the Coordinating Board not approve the degree.

Thank you for the opportunity to comment on this proposal. Please do not hesitate to reach out if you have questions or comments regarding any of the information or arguments presented in this letter. We look forward to the coming CBHE meetings on this subject.

Thank you,



Steve Graham, Ph.D.  
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### **Attachments:**

- A. CBHE Board Book Tab 8 Attachment B: Additional Criteria -- St. Charles Community College Bachelor of Applied Science in Occupational Therapy Assistant (Sept. 11, 2019)
- B. CBHE Board Book Tab 12 Pages 2-3: Plan for Comprehensive Review of Academic Program Proposals (June 7, 2018)



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August 24, 2020

Zora Mulligan, Commissioner of Higher Education  
Missouri Department of Higher Education and Workforce Development  
301 W. High Street P.O. Box 1469  
Jefferson City, MO 65201-1469

Commissioner Mulligan,

To address concerns brought forth during the second round of public comments, St. Charles Community College (SCC) will provide context regarding the partnership between SCC and Missouri State University (MSU) in the development of the Bachelor's of Applied Science in Occupational Therapy Assistant (OTA). SCC was advised that their original proposal was in phase two of the review process and needed additional documentation to the detailed market analysis and the progress on choosing a four-year partner. As advised, SCC provided the required addendums including the market analysis and a degree plan. Below is a narrative response to the second round of public comments.

The degree plan outlined by SCC in cooperation with MSU was designed not only to meet the Accreditation Council for Occupational Therapy Education (ACOTE) baccalaureate standards, but also support community and industry needs. Both industry trends and ACOTE standards speak to gaps in the education of an associate-prepared OTA, specifically in the areas of program development, education, and understanding of social and healthcare policy as critical skill-sets for the future of the profession, particularly as they pertain to caring for marginalized and underserved populations. The coursework chosen in collaboration with MSU reflects the leadership skills and social aspects of healthcare necessary to support these populations in our communities.

SCC has an established and sustainable OTA program with ACOTE baccalaureate standards surrounding number of faculty, fieldwork sites, and instructional space currently in place. The baccalaureate content will be integrated throughout the program with a culminating project designed to address community health needs in the areas of mental health, aging in place, and community-based early intervention. The expanded general education courses, upper-level courses taught by MSU, and the OTA baccalaureate capstone project will elevate the current program to meet ACOTE standards and community needs.

As SCC's four-year partner, MSU will deliver 21 credit hours of upper-level coursework and nine credit hours of general education coursework chosen to support the evolving needs in healthcare practice. The combination of upper-level coursework, MSU faculty expertise, and the diversity of thought present in majors-level university courses will

uniquely position program graduates to be healthcare leaders, changing the landscape of practice in our community as called on by ACOTE. MSU has indicated this combination of courses could lead to a future certificate in healthcare leadership, further enhancing the workforce in the state. This baccalaureate proposal continues to honor the pillars in the blueprint of higher education and the philosophy of higher education by including 42 credit hours of general education coursework. As an applied degree, courses that satisfy general education requirements were intentionally selected to support industry standards and develop healthcare leaders.

SCC and MSU are in the process of finalizing an MOU which addresses tuition, financial aid, program expense, registration, program admission, and advising for students in the proposed program. The MOU will be submitted by September 4, 2020, as advised by MDHE staff. Included with this response is a degree plan and detailed institutional responsibility for course offerings. Both SCC and MSU have faculty, staff, and student support resources currently in place to meet the needs of program expansion. This includes technology to support remote learning, physical capacity, and fieldwork sites. Policies and procedures of the institution responsible for instruction will govern related faculty reporting structure, ownership of intellectual property, and resolution of student grievances. SCC will bear the responsibility of meeting, maintaining, and reporting on all ACOTE standards.

St. Charles Community College appreciates the opportunity to respond to comments made by University of Missouri and Southeast Missouri State University.

Thank you,



Amy M. Koehler  
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Dardenne Creek Campus  
St. Charles Community College  
636-922-8282  
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## MSU/SCC BAS-OTA Degree Plan

**NOTE: SCC Admission Requirements Include English Composition I and Beginning Algebra**

**Courses taught by MSU include 9 credit hours towards the GenEd block and 21 hours of upper level coursework.**

Semester 1	Course Name	Credit Hours
MAT 147	Healthcare Statistics	3
PSY 101	<b>Introduction to Psychology</b>	<b>3</b>
<b>GenEd Civics</b>	<b>PolSci/Gov</b>	<b>3</b>
COM 110	<b>Interpersonal Communication</b>	<b>3</b>
ENG 102	English Comp II	3
OTA 100	Intro to OTA Baccalaureate Project	1
	Semester Total	16

Semester 3	Course Name	Credit Hours
IPE 378	<b>Healthcare Quality Management</b>	<b>3</b>
CDF 532	<b>Family Advocacy</b>	<b>3</b>
EDU 247	Multicultural Education	3
OTA 200	Occupational Science	3
OTA 201	Applied A&P in Health & Disease	4
	Semester Total	16

Semester 5	Course Name	Credit Hours
BMS 599	<b>Health Literacy in the Human Services</b>	<b>3</b>
MGM 340	<b>Principles of Management</b>	<b>3</b>
OTA 305	Foundations of OTA Theory I	5
OTA 315	Foundations of OTA Practice I	3
OTA 325	Foundations of OTA Field Experience	2
	Semester Total	16

Semester 7	Course Name	Credit Hours
OTA 406	Foundations of OTA Theory III	5
OTA 416	Foundations of OTA Practice III	3
OTA 426	Foundations of OTA Field Experience III	3
OTA 402	Bacalaureate Project II	3
OTA 412	OTA Portfolio II	1
	Semester Total	15

Semester 2	Course Name	Credit Hours
OTA 200	Occupational Justice & Social Determinants of Health	3
GenEd/C42 Elective	History of Disability & Marginalized Populations	3
PSY 210	Human Growth & Development	3
OTA 215	Functional Anatomy & Kinesiology	3
SOC 341	Medical Sociology	3
	Semester Total	15

Semester 4	Course Name	Credit Hours
BUS 105	Business Ethics	3
IPE 379	<b>Interprofessional Perspectives on Population Health</b>	<b>3</b>
IPE 382	<b>Intro to Health Insurance and Managed Care</b>	<b>3</b>
OTA 301	Foundations of Occupational Therapy	3
OTA 311	Engaging in Occupation Across the Lifespan	3
	Semester Total	15

Semester 6	Course Name	Credit Hours
OTA 405	Foundations of OTA Theory II	5
OTA 415	Foundations of OTA Practice II	3
OTA 425	Foundations of OTA Field Experience II	3
OTA 302	Bacalaureate Project	3
OTA 312	OTA Portfolio	1
	Semester Total	15

Semester 8	Course Name	Credit Hours
OTA 427	OTA Practicum I	4
OTA 428	OTA Practicum II	4
OTA 407	OTA Capstone	2
OTA 404	Bacalaureate Project III	2
	Semester Total	12

Total Credit Hours	120
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**Instructional Responsibility by Institution**

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St. Charles Community College		Missouri State University			
Course Number	Course Name	Credit Hours	Course Number	Course Name	Credit Hours
BUS 105	Business Ethics	3	BMS 599	Health Literacy in the Human Services	3
EDU 247	Multicultural Education	3	CDF 532	Family Advocacy	3
ENG 102	English Comp II	3	COM 110	Interpersonal Communication	3
GenEd/C42 Elective	History of Disability & Marginalized Populations	3	GenEd Civics	PolSci/Gov	3
MAT 147	Healthcare Statistics	3	IPE 378	Healthcare Quality Management	3
OTA 425	Foundations of OTA Field Experience II	3	IPE 379	Interprofessional Perspectives on Population Health	3
OTA 100	Intro to OTA Baccalaureate Project	1	IPE 382	Intro to Health Insurance and Managed Care	3
OTA 200	Occupational Justice and Social Determinants of Health	3	MGM 340	Principles of Management	3
OTA 200	Occupational Science	3	PSY 101	Introduction to Psychology	3
OTA 201	Applied A&P in Health & Disease	4	SOC 341	Medical Sociology	3
OTA 215	Functional Anatomy & Kinesiology	3		<b>Total Credit Hours</b>	<b>30</b>
OTA 301	Foundations of Occupational Therapy	3			
OTA 302	Bacalaureate Project	3			
OTA 305	Foundations of OTA Theory I	5			
OTA 311	Engaging in Occupation Across the Lifespan	3			
OTA 312	OTA Portfolio	1			
OTA 315	Foundations of OTA Practice I	3			
OTA 325	Foundations of OTA Field Experience	2			
OTA 402	Bacalaureate Project II	3			
OTA 404	Bacalaureate Project III	2			
OTA 405	Foundations of OTA Theory II	5			
OTA 406	Foundations of OTA Theory III	5			
OTA 407	OTA Capstone	2			
OTA 412	OTA Portfolio II	1			
OTA 415	Foundations of OTA Practice II	3			
OTA 416	Foundations of OTA Practice III	3			
OTA 426	Foundations of OTA Field Experience III	3			
OTA 427	OTA Practicum I	4			
OTA 428	OTA Practicum II	4			
PSY 210	Human Growth & Development	3			
<b>Total Credit Hours</b>		<b>90</b>			

**Tab 13 Attachment M**  
**DHEWD Statutory Criteria Review**

**Occupational Therapy Assistant  
Comprehensive Review  
Statutory Criteria**

<b>For community colleges proposing to offer a bachelor's degree, the following additional criteria is required, as outlined in § 163.191(1), RSMo:</b>		
<b>Criterion</b>	<b>Criteria Met/Not Met</b>	<b>Information Requested and Request Dates</b>
The level of education required in a field for accreditation or licensure increases to the baccalaureate degree level or, in the case of applied bachelor's degrees, the level of education required for employment in a field increases to that level, AND	<b>Not Met</b> 1) Entry into the field will remain at the associate and bachelor's degree. 2) The Missouri Division of Professional Registration confirmed that associate and baccalaureate level OTA students will sit for the same licensing examination. 3) 2018 Employment Projections program, U.S. Bureau of Labor Statistics indicates the typical education needed for entry into the OTA field is the associate degree.	<ul style="list-style-type: none"><li>• Statutory Requirement</li><li>• Statewide OTA Meeting held 2/26/2019</li><li>• Face-to-Face meeting at SCC held 8/20/2019</li><li>• Call with John Bookstaver on 4/16/2020</li><li>• Follow-up email to John Bookstaver on 4/27/2020</li></ul>
When doing so would not unnecessarily duplicate an existing program, collaboration with a university is not feasible or the approach is not a viable means of meeting the needs of students and employers, AND	<b>Not Met</b> The Phase II proposal does not mention or discuss collaboration between SCC and MSU. There is also no information provided about the relationship between SCC and MSU regarding who would obtain accreditation (or be required to obtain accreditation).  Additionally, two four-year institutions in Missouri, the University of Missouri-Columbia and Central Methodist University, have proceeded to the Applicant Phase of the accreditation process, with the University of Missouri being slated to accept students in August 2021. There was no mention of these institutions in the Phase II proposal. There was also no mention of whether there would be a need for the community college to offer the program since two universities received approval.	<ul style="list-style-type: none"><li>• Statutory Requirement</li><li>• Statewide OTA Meeting held 2/26/2019</li><li>• Face-to-Face meeting at SCC held 8/20/2019</li><li>• Call with John Bookstaver on 4/16/2020</li><li>• Follow-up email to John Bookstaver on 4/27/2020</li></ul>
The institution has the academic and financial capacity to offer the program in a high-quality manner.	<b>Not Met</b> Although tuition information has been submitted, a comprehensive cost/revenue analysis summarizing the	<ul style="list-style-type: none"><li>• Statutory Requirement</li><li>• Statewide OTA Meeting held 2/26/2019</li></ul>

	<p>actual costs for the program and information about how the institution intends to fund and sustain the program was not submitted.</p> <p>9/8/20 Addendum: SCC submitted stated in response to the External Review Team's Report that the program would be funded through Perkins funds, however, a comprehensive cost/revenue analysis with actual costs was provided.</p>	<ul style="list-style-type: none"> <li>• Face-to-Face meeting at SCC held 8/20/2019</li> <li>• Call with John Bookstaver on 4/16/2020</li> <li>• Follow-up email to John Bookstaver on 4/27/2020</li> </ul>
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**Elements of a Complete Proposal for Comprehensive Review. A complete proposal includes the following, as outlined in 6 CSR 10-4.010:**

Evidence of good faith effort to explore the feasibility of collaboration with other institutions whose mission or service region encompasses the proposed program. At a minimum, this will include letters from the chief academic officers of both the proposing institution and other institutions involved in exploring the feasibility of collaboration attesting to the nature of the discussions and explaining why collaboration in this instance is not feasible;	<p><b>Not Fully Met</b></p> <p>The Phase II proposal does not mention or discuss collaboration between SCC and MSU. There is also no information provided about the relationship between SCC and MSU regarding who would obtain accreditation (or be required to obtain accreditation). There is also no indication for why collaboration with other institutions is not feasible.</p>	<ul style="list-style-type: none"> <li>• Administrative Rule Requirement</li> <li>• Statewide OTA Meeting held 2/26/2019</li> <li>• Face-to-Face meeting at SCC held 8/20/2019</li> <li>• Call with John Bookstaver on 4/16/2020</li> <li>• Follow-up email to John Bookstaver on 4/27/2020</li> </ul>
Evidence that the offering institution is contributing substantially to the CBHE's Blueprint for Higher Education as adopted on February 4, 2016, pursuant to section 173.020(4), RSMo, and is committed to advancing the goals of that plan; Evidence of institutional capacity to launch the program in a high-quality manner, including: <ul style="list-style-type: none"> <li>• An external review conducted by a team including faculty experts in the discipline to be offered and administrators from institutions already offering programs in the discipline and at the degree level proposed.</li> </ul>	<p><b>See External Review Team documents attached.</b></p>	

<ul style="list-style-type: none"> <li>The review must include an assessment of the offering institution's capacity to offer the new program in terms of general, academic, and student service support, including faculty resources that are appropriate for the program being proposed (e.g. faculty credentials, use of adjunct faculty, and faculty teaching workloads);</li> </ul>	<b>Not Fully Met.</b>	
<ul style="list-style-type: none"> <li>A comprehensive cost/revenue analysis summarizing the actual costs for the program and information about how the institution intends to fund and sustain the program;</li> </ul>	<b>Not Met</b> Although tuition information has been submitted, a comprehensive cost/revenue analysis summarizing the actual costs for the program and information about how the institution intends to fund and sustain the program was not submitted.	<ul style="list-style-type: none"> <li>Administrative Rule Requirement</li> <li>Statewide OTA Meeting held 2/26/2019</li> <li>Face-to-Face meeting at SCC held 8/20/2019</li> <li>Call with John Bookstaver on 4/16/2020</li> <li>Follow-up email to John Bookstaver on 4/27/2020</li> <li>Conversation with Amy Koehler on 7/31/2020</li> </ul>
<ul style="list-style-type: none"> <li>Evidence indicating there is sufficient student interest and capacity to support the program, and, where applicable, sufficient capacity for students to participate in clinical or other external learning requirements, including library resources, physical facilities, and instruction equipment; and</li> </ul>	<b>Not Fully Met</b> The proposal does not reference the development of the two programs at Central Methodist University and the University of Missouri-Columbia and impacts to student capacity, particularly clinical capacity, or whether there would be need for a community college to offer the program when two universities in Missouri will offer the program.	<ul style="list-style-type: none"> <li>Administrative Rule Requirement</li> <li>Statewide OTA Meeting held 2/26/2019</li> <li>Face-to-Face meeting at SCC held 8/20/2019</li> <li>Call with John Bookstaver on 4/16/2020</li> <li>Follow-up email to John Bookstaver on 4/27/2020</li> <li>Conversation with Amy Koehler on 7/31/2020</li> </ul>
<ul style="list-style-type: none"> <li>Where applicable, a description of accreditation requirements for the new program and the institution's plans for seeking accreditation; and</li> </ul>	<b>Not Fully Met</b> There is not information regarding the full process of applying for accreditation through ACOTE, and HLC accreditation is mentioned only as an aside. According the HLC, the process for submitting a substantive process review for a mission change can be anywhere from 3-8 months.	<ul style="list-style-type: none"> <li>Administrative Rule Requirement</li> <li>Statewide OTA Meeting held 2/26/2019</li> <li>Face-to-Face meeting at SCC held 8/20/2019</li> </ul>

		<ul style="list-style-type: none"> <li>• Call with John Bookstaver on 4/16/2020</li> <li>• Follow-up email to John Bookstaver on 4/27/2020</li> <li>• Conversation with Amy Koehler on 7/31/2020</li> </ul>
Evidence that the proposed program is needed, including: <ul style="list-style-type: none"> <li>• Documentation demonstrating that the program does not unnecessarily duplicate other programs in the applicable geographic area, as described in subsection (9)(C) of this rule;</li> </ul>	<p><b>Not Met</b></p> <p>No reference to the University of Missouri or Central Methodist University programs that will be accepting students soon.</p>	<ul style="list-style-type: none"> <li>• Administrative Rule Requirement</li> <li>• Statewide OTA Meeting held 2/26/2019</li> <li>• Face-to-Face meeting at SCC held 8/20/2019</li> <li>• Call with John Bookstaver on 4/16/2020</li> <li>• Follow-up email to John Bookstaver on 4/27/2020</li> <li>• Conversation with Amy Koehler on 7/31/2020</li> </ul>
<ul style="list-style-type: none"> <li>• A rigorous analysis demonstrating a strong and compelling workforce need for the program, which might include data from a credible source, an analysis of changing program requirements, the current and future workforce, and other needs of the state, and letters of support from local or regional businesses indicating a genuine need for the program; and <ul style="list-style-type: none"> <li>○</li> </ul> </li> </ul>	<p><b>Not Met</b></p> <p>SCC has not shown that a bachelor's degree in OTA is necessary, only that students may need a bachelor's degree (which could be in any field), not specifically OTA.</p>	<ul style="list-style-type: none"> <li>• Administrative Rule Requirement</li> <li>• Statewide OTA Meeting held 2/26/2019</li> <li>• Face-to-Face meeting at SCC held 8/20/2019</li> <li>• Call with John Bookstaver on 4/16/2020</li> <li>• Follow-up email to John Bookstaver on 4/27/2020</li> <li>• Conversation with Amy Koehler on 7/31/2020</li> </ul>

<ul style="list-style-type: none"> <li>• A clear plan to meet the articulated workforce need, including:           <ul style="list-style-type: none"> <li>○ Aligning curriculum with specific knowledge and competencies needed to work in the field(s) or occupation(s) described in the workforce need analysis in part (II) of this subparagraph;</li> <li>○ Providing students with external learning experiences to increase the probability that they will remain in the applicable geographic area after graduation; and</li> <li>○ A plan for assessing the extent to which the new program meets that need when implemented.</li> </ul> </li> </ul>	<p><b>Not Met</b></p> <p>SCC has provided a number of documents outlining the courses to be taken, but has not supplied knowledge and competencies documents, a detailed description of experiential learning aimed at increasing the probability that they will remain in the geographic area after graduation, nor a plan for assessing the extent to which the new program meets the need when implemented.</p>	<ul style="list-style-type: none"> <li>• Administrative Rule Requirement</li> <li>• Statewide OTA Meeting held 2/26/2019</li> <li>• Face-to-Face meeting at SCC held 8/20/2019</li> <li>• Call with John Bookstaver on 4/16/2020</li> <li>• Follow-up email to John Bookstaver on 4/27/2020</li> <li>• Conversation with Amy Koehler on 7/31/2020</li> </ul>
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Missouri Department of Higher Education & Workforce Development  
301 W. High St., Suite 860  
PO Box 1469  
Jefferson City, MO 65102

Dear Coordinating Board for Higher Education,

The External Review Team has completed the review of the St. Charles Community College (SCCC) proposed Occupational Therapy Assistant (OTA) program expansion to include a Bachelor of Science degree in OTA. As stated in RSMo 163.191, community college offerings typically lead to certificates, diplomas, or associate degrees, and may include baccalaureate degrees when authorized by CBHE. SCCC is proposing the OTA program and the provided justifications meet the criteria outlined in the statutory process.

### **Recommendation**

The Review Team has conducted a review of the Phase II proposal, the accompanying supporting documents, and compared these with the criteria set out by the Missouri Department of Higher Education & Workforce Development (MDHEWD), State of Missouri House Bill 758, and the new Accreditation Council for Occupational Therapy Education (ACOTE) baccalaureate standards. After thorough review and discussion, the External Review Team reached consensus that an overwhelming majority of the requirements as established through statute and administrative rule were not met or were not fully met.

**Therefore, it is the Team consensus to not recommend the SCCC program expansion proposal for approval.**

A response to the public comments from SCCC was shared two days prior to this report's completion date. The response focused on the MOU with Missouri State and did not address the bulk of the concerns raised or those concerns expressed in this document.

Findings of the Review Team are summarized below according to criteria from each of the governing/accrediting bodies.

The St. Charles Community College (SCC) and Missouri State University (MSU) response to the External Review Team finding is written below in red. SCC/MSU have provided a response to each criterion as outlined. As a reminder, SCC was asked to leave their original proposal in que in order to maintain the review timeline, find a four-year partner, submit a joint degree plan, and amend and restate the original Memorandum of Understanding. SCC has found a partner in Missouri State University (MSU), submitted the jointly outlined degree plan and submitted an Amended and Restated Memorandum of Understanding as requested by MDHE staff on or before 9/4/20. SCC/MSU replied to phase II comments from the University of Missouri-Columbia and Southeast Missouri State University. While neither SCC nor MSU were given the opportunity to participate in the External Review process, we appreciate the opportunity to outline our collaborative responses below.

### **Analysis**

Administrative rule in 6 CSR 10-4.010

**Evidence of good faith effort to explore the feasibility of collaboration with other institutions whose mission or service region encompasses the proposed program.**

**NOT MET:** 6 CSR 10-4.010 states that evidence of a good faith effort to explore the feasibility of collaboration with other institutions and that at a minimum, that will include letters from chief academic officers involved in exploring the feasibility and why collaboration is or is not feasible. The proposal submitted does not provide detail on what options were explored and why they were or were not feasible. The SCCC/Missouri State University (MSU) MOU provided limited information on the collaboration and structure of the collaboration. Details that were addressed and concerns the review committee had include:

A typical collaboration between two and four-year granting institutions is mutually beneficial, and the institutions offer portions of programs that align with their mission and focus. The proposal mentions MSU teaching only general education courses.

Not only was a good faith effort explored, SCC and MSU agreed to jointly offer the degree. The course work that Missouri State will deliver includes some general education courses (9 hours), but the majority (21 hours) will be upper division work that complements and supplements the BOTA program goals, including interprofessional healthcare leadership, which is also an essential skill tied to the baccalaureate project as outlined in the degree plan. The degree plan was a collaborative effort between institutions, is mutually beneficial, and offers portions that align with each institutions mission and focus.

SCC will bear the responsibility of meeting, maintaining, and reporting on all ACOTE standards. SCC will develop and teach all OTA coursework. MSU does not intend to pursue accreditation to offer a Bachelor's of OTA. ACOTE accreditation will rest with SCC. OTA and OT are distinct and separate professions. OTA remains a separate career path, is a terminal degree, and not intended to be a pathway into a graduate program in Occupational Therapy.

Baccalaureate granting institutions in Missouri were willing to collaborate with SCCC. The proposals show SCC offering all content/discipline specific courses and the baccalaureate project.

SCC has the resources to offer the discipline specific content, including a successful OTA program and subject matter experts. They desire to continue to offer the discipline specific courses, to provide continuity and consistency to enrolled students. MSU is well positioned to offer upper division coursework that will be complementary to the OTA program goals and student success. MSU does not have an OTA program, therefore content specific courses will remain with the appropriate institution. MSU will offer upper division coursework in the area of interprofessional healthcare leadership, which will position BOTA graduates to assume leadership roles in their communities.

The proposal states that other collaboration would not meet the needs of students because ACOTE has an extensive waitlist for new accreditations. ACOTE changed their guideline and is no longer differentiating between applications for new programs and those for existing programs. Institutions are able to seek accreditation for new program accreditation in a timely manner.

SCC and MSU are not proposing a new program but will transition the program from the associate level to the baccalaureate level. This process does not require a waiting period. New programs must adhere to the below policy.

According to the ACOTE website, the following policy states:

ACOTE policy III.A.1., "The Application Review" states that "ACOTE will accept and review a maximum of 12 Candidacy Applications from new programs during a given cycle. The assignment of due dates for Candidacy Applications will be based on the receipt date of the Letter of Intent. After the 12-

program cap is reached, programs will be subject to the next available review cycle and planned student admission must be delayed accordingly.”

Beginning with Candidacy Applications due in August 2020, ACOTE is requiring that a qualified program director must be hired full-time and on-site 1 year prior to the submission of the Candidacy Application. A qualified academic fieldwork coordinator must be hired full-time and on-site 6 months prior to the submission of the Candidacy Application.

o At the time of the proposal, there were no bachelor level OTA programs in the state, but there were four-year institutions with upper-level courses, the University of Missouri, a public institution, and Central Methodist University, a private institution.

Currently no public institution in the state of Missouri offers a bachelor's of OTA degree or upper level coursework that awards a bachelor's of OTA. While there are other 4-year institutions in the state that could deliver upper level coursework, Missouri State was chosen as a partner. Their fee structure is the closest to SCC's, making cost to students comparable to SCC. [Estimates: CMU = \$1045/credit hour; Mizzou = \$947/credit hour; Missouri State = \$299/credit hour]. MSU's mission as a comprehensive institution that educates students to be global citizen scholars, committed to public affairs, aligns well with SCC's mission to promote academic excellence, student success, workforce advancement, and life-long learning within a global society.

**Evidence that the offering institution is contributing substantially to the 2014 CBHE's Blueprint for Higher Education pursuant to section 173.020(4), RSMo, and is committed to advancing the goals of that plan.**

1. Evidence of institutional capacity to launch the program in a high-quality manner, including:  
An external review conducted by a team including faculty experts in the discipline to be offered and administrators from institutions already offering programs in the discipline and at the degree level proposed. The review must include an assessment of the offering institution's capacity to offer the new program in terms of general, academic, and student service support, including faculty resources that are appropriate for the program being proposed (e.g. faculty credentials, use of adjunct faculty, and faculty teaching workloads);

**NOT FULLY MET:** The institution's capacity to offer the new program was not sufficiently demonstrated in the proposal. The SCCC Proposal states that SCCC has four full-time faculty and two adjunct faculty. Two of the full-time faculty have a “minimum of a master’s degree.” Details were not provided to link the faculty with the credential and the expectations for teaching, faculty workload and faculty support information was not provided. Information on student services or other areas that may need additional resources due to expansion of a different degree level was not provided

This proposal will transition the associate degree program to a baccalaureate program. Both institutions have strong student support systems in place and do not anticipate the need for additional services.

The OTA Department at SCC is currently comprised of five full-time faculty members and exceeds ACOTE faculty requirements for a baccalaureate degree. As an applied science, the OTA program is defined as a specialized career program. Both colleges employ subject matter experts in accordance with HLC guidelines surrounding education, training, and tested experience and will continue to adhere to guidelines set forth by accrediting bodies.

The requirement for institutional capacity to deliver the new program in the area of student services has been addressed and met. SCC and MSU have agreed to an MOU that outlines the student services functions. Teams from both institutions were involved in the creation of the MOU. The MOU clearly indicates how student services functions that include but are limited to; admission, registration, financial aid, academic integrity, and general support services will be delivered. Both institutions have the capacity to provide the services agreed on in the MOU. Therefore, this aspect of the requirement for the program review has been met.

2. A comprehensive cost/revenue analysis summarizing the actual costs for the program and information about how the institution intends to fund and sustain the program

**NOT MET:** The financial capacity and documentation of financial projections did not focus on the institution's ability to meet that need. The primary financial emphasis addressed the cost of tuition for the students and how attending a program at the community college would be more cost effective to the students. It does not address the additional costs needed for dedicated faculty or additional resources needed to support the baccalaureate degree. There are no projected enrollments for the baccalaureate program and associated revenue/expense data. There is mention of the purchase of a new building which adds additional rooms, labs, and office space but no specifics were offered regarding capacity or budget needs to support the facilities and program

The OTA Department at SCC is currently comprised of five full-time faculty members, exceeding ACOTE faculty requirements for a baccalaureate degree.

SCC adopted a tiered tuition model to support program sustainability.

SCC recognizes the projected revenue will not meet projected expenses. SCC remains committed to its mission and believes offering this degree will help meet the needs of the vulnerable populations we serve.

When budgeting, SCC plans to fund all salaries and expenses related to the program. As a specialized career program, OTA is eligible for Carl Perkins funding and state enhancement grant funding due to the projected growth and need for the profession. These funds are applied after the budget process is complete.

In order to obtain and maintain ACOTE accreditation, the OTA program at SCC must routinely demonstrate it is meeting or exceeding ACOTE standards. SCC was granted permission by ACOTE to expand and grow the OTA program in 2018. As such, current ACOTE program accreditation provides evidence indicating there is sufficient student interest and capacity to support the program, and, where applicable, sufficient capacity for students to participate in clinical or other external learning requirements, including sufficient faculty, fieldwork placements, library resources, physical facilities, support staff, and instruction equipment.

**NOT FULLY MET:** A market analysis firm (report provided as additional materials) conducted an analysis of student interest, community need, including a number of active job listings and workforce need, and adequate facilities and clinical partners. The market analysis supported the need for OTA graduates and the growing employment opportunities. The report did not address the need for the bachelor's degree and that employers are currently demanding that degree level. Student interest was briefly addressed as SCCC provided survey data that 100% of former graduates who responded would have sought a bachelor's degree and that 92% of the respondents strongly agree they would enroll in a bachelor's completion option. The number of respondents was not provided.

Demonstrate the ability to synthesize in-depth knowledge in a practice area through the development and completion of a baccalaureate project in one or more of the following areas: clinical practice skills, administration, leadership, advocacy, and education

Since the degree does not yet exist, jobs in emerging practice areas included the job skills/competency requirements, job descriptions and educational requirements (of a bachelor's degree). Students with an associate degree did not possess the educational requirements, however often possessed the skills necessary to join and enhance those areas of the workforce. SCC has several community partners where Faculty Led Fieldwork programs exist. The partnerships were established in areas where populations are traditionally underserved and where the OT profession could better serve if sufficient opportunities exist. The fieldwork programs SCC established are in the areas of aging in place, community mental health, and early childhood services. These partnerships highlighted the need and allowed these settings to benefit from the skills and services an OTA practitioner could provide. Several of these partners were interested in hiring SCC graduates however the degree currently awarded by SCC (associates) does not meet the entry level requirements for employment (bachelor's degree). The upper division coursework offered by MSU, along with the baccalaureate project offered by SCC, are designed to focus on areas of administration, quality improvement/assurance, leadership, education, and advocacy. The baccalaureate project can be implemented at these fieldwork programs, with focus in the aforementioned areas, with the populations who are currently underserved in our community.

Included in the proposal were letters from various community partners who expressed their support and encouragement of SCC offering the Bachelor's degree. This phenomenon highlights the value of the OTA skill set, the contribution of these practitioners to these underserved communities and critical disparity in associate degree versus a bachelor's degree in OTA.

The number of respondents in the OTA student survey was 47 students at the time of the survey.

4. Where applicable, a description of accreditation requirements for the new program and the institution's plans for seeking accreditation

**NOT MET:** ACOTE accreditation at the baccalaureate level requires that students "demonstrate the ability to synthesize in-depth knowledge in a practice area through the development and completion of a baccalaureate project in one or more of the following areas: clinical practice skills, administration, leadership, advocacy, and education." The proposal does not make it clear that SCC will meet the ACOTE criteria or provide details on the baccalaureate project.

SCC addressed both the baccalaureate project and content in the narrative response and the degree plan. Both describe the baccalaureate project being threaded throughout the curriculum. The project includes experiential fieldwork opportunities in underserved areas in the community and supportive upper-level coursework to address the in-depth knowledge in administration, leadership, and advocacy. MSU will provide an essential theoretical component as well as a potential certificate in healthcare leadership.

At this time SCCC does not have regional accreditation from the Higher Learning Commission (HLC) to offer a bachelor's degree which would be a pre-requisite to seeking professional accreditation.

SCC does not currently hold HLC accreditation to offer a bachelor's degree. The degree will be jointly conferred and MSU is accredited through HLC to offer a bachelor's degree. If required to seek HLC approval, SCC is well-positioned to begin the process as it is currently completing a ten-year comprehensive self-study.

**Evidence that the proposed program is needed, including:**

1. Documentation demonstrating that the program does not unnecessarily duplicate other programs in the applicable geographic area, as described in subsection (9)(C) of this rule;

**NOT MET:** In the proposal, the Market Report conducted by River Henge Partners LLC states that: “throughout Missouri’s Occupational Therapy Spectrum, there are sixteen colleges, universities and technical schools that are focused on OTA programming.”

Their report mentioned nine accredited through ACOTE and three programs in the St. Louis region. The proposal did not detail the need for additional programming in the region or that current programs do not have the capacity to meet the regional need

Currently no public institution in the state of Missouri offers a bachelor's of OTA degree. There is a clear distinction in both education, scope of practice, and accreditation guidelines between Occupational Therapy and Occupational Therapy Assistant. As such, the bachelor's prepared OTA will serve in a different capacity as an associate degree prepared OTA. The two do not compare.

2. A rigorous analysis demonstrating a strong and compelling workforce need for the program, which might include data from a credible source, an analysis of changing program requirements, the current and future workforce, and other needs of the state, and letters of support from local or regional businesses indicating a genuine need for the program

**NOT MET:** The OT profession continues to support the associate degree as the entry level; currently there are no OTA baccalaureate degree graduates. Workforce data from AOTA still support 2-year entry. Workforce data in the proposal support the need for OTAs but not specifically the need for baccalaureate prepared OTAs.

While the OT profession continues to support an associate degree as an option for entry-level practice, they also support the baccalaureate degree for the OTA as an option for entry-level practice. ACOTE established accreditation standards for a bachelor's of OTA degree to address the gaps in knowledge of an associate degree. A bachelor's degree in healthcare administration does not provide students with the necessary focused skills as would an applied bachelor's degree in Occupational Therapy Assistant. The bachelor's degree in OTA would allow students to demonstrate their competency in clinical practice skills, administration, leadership, advocacy, and education specific to the field of occupational therapy and the contribution of a bachelor's prepared OTA to the community SCC serves.

AOTA's Vision 2025 states:

*“As an inclusive profession, occupational therapy maximizes health, well-being, and quality of life for all people, populations, and communities through effective solutions that facilitate participation in everyday living.”*

The pillars of Vision 2025 as follows:

- **Effective:** Occupational therapy is evidence based, client centered, and cost-effective.
- **Leaders:** Occupational therapy is influential in changing policies, environments, and complex systems.
- **Collaborative:** Occupational therapy excels in working with clients and within systems to produce effective outcomes.

- **Accessible:** Occupational therapy provides culturally responsive and customized services.
- **Equity, Inclusion, and Diversity:** We are intentionally inclusive and equitable and embrace diversity in all its forms.

Vision 2025 is designed to guide the profession beyond its 100-year anniversary, which was in 2017.

The pillars help further define and communicate the Vision's core tenets to key stakeholders, including OTs, OTAs, educators, students, consumers, policymakers, and the general public."

With these statements, AOTA is encouraging educators, policy makers, and OTAs to prepare both for present needs and prepare for the future needs of the populations the profession serve. With this degree plan and partnership, SCC and MSU are working to prepare our students for the future and to help facilitate and expand the OTA's ability to participate in and contribute to Vision 2025. A bachelor's degree in OTA is clearly in the vision of AOTA and the future of the profession.

3. A clear plan to meet the articulated workforce need, including:

a. Aligning curriculum with specific knowledge and competencies needed to work in the field(s) or occupation(s) described in the workforce need analysis in part (II) of this subparagraph

**NOT MET** – Course titles and curriculum design were provided by SCCC. Comparison of ACOTE standards with course objectives was not provided; therefore it was not possible to determine curriculum alignment to competencies or workforce needs.

If the BOTA degree is approved, SCC will engage in the accreditation process to transition from the associates to bachelor's degree in OTA. This process includes a detailed description and review by qualified ACOTE accrediting bodies who are experts in the field. The accreditation process is currently supportive of associate degree programs transitioning to baccalaureate degree programming and there is no waiting period to begin the transition. ACOTE will conduct a thorough review of curricular mapping and curriculum design to ensure ACOTE standards are met, which include competencies for addressing increased workforce needs.

b. Providing students with external learning experiences to increase the probability that they will remain in the applicable geographic area after graduation

**NOT MET** – Descriptions of learning experiences and partnerships combined with workforce data did not indicate the probability that students would be able to obtain employment in their geographical area. Further, it was unclear if the letters of support were related to the bachelor's project and fieldwork required for the baccalaureate degree.

As stated in earlier comments, SCC has several community partners where Faculty Led Fieldwork programs exist in the SCC service area. Establishing these programs led to partner interest in hiring SCC graduates however the degree awarded (associates) did not meet the entry-level requirements for employment. Included in the proposal were letters from community partners expressing their support and encouragement of offering the Bachelor's degree.

c. A plan for assessing the extent to which the new program meets that need when implemented

**NOT MET** – No plan for assessing whether the new program meets current needs was provided. However, SCCC did attempt to make a case for the need of the bachelor's degree (see section on need). It

is implied that obtaining and sustaining AOTA accreditation would ensure quality but whether needs are being met is not explicitly addressed.

An essential component of maintaining ACOTE accreditation is assessing and ensuring not only the quality of education and the meeting of the standards but also meeting the needs of students in terms of employment and satisfaction with the program. Maintaining ACOTE accreditation also requires programs report on outcomes of employer surveys which must be conducted annually to ensure employer satisfaction. An annual survey of program graduates must also be conducted and reported on to ensure preparation for, and ability to meet, workforce needs. SCC engages in rigorous and annual quality improvement and assurance measures and successfully maintain all accreditation.

If you have questions regarding our review, please contact Zora Mulligan, Commissioner of Higher Education, Missouri Department of Higher Education & Workforce Development.

Thank you for the opportunity to review this program expansion proposal.

SCC and MSU appreciate the opportunity to respond to this thorough review.