



Tab 22 Comprehensive Review

Coordinating Board for Higher Education
December 11, 2019

BACKGROUND

In 2017, the Coordinating Board for Higher Education (CBHE) adopted a revised process for the review of new academic program proposals which streamlined the process into three levels of review¹: staff, routine, and comprehensive reviews. **Staff review** and **routine review** applies to proposed new programs and program changes that meet specific criteria, and can be expedited through the review process, usually within 30 days.

A **comprehensive review** of a program is triggered by the presence of one or more of the following criteria:

- The institution will incur substantial costs to launch and sustain the program;
- The program includes offering degrees at the baccalaureate level or higher that fall within the Classification of Instructional Program (CIP) code of 14, Engineering;
- The program is outside an institution's CBHE-approved mission;
- The program will include the offering of a doctoral degree (applicable only to non-University of Missouri institutions); or
- The program will include the offering of an education specialist degree.

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."

St. Charles Community College (SCC) submitted a proposal to offer the Bachelor of Applied Science in Occupational Therapy Assistant (OTA) (Attachment A) for consideration through the comprehensive review process. SCC currently offers an associate degree in OTA, and the proposed program would transition their existing degree into a bachelor's degree.

CURRENT STATUS

The Missouri Department of Higher Education and Workforce Development received the following comments regarding SCC's proposal: a joint letter submitted on behalf of four-year chief academic officers (Attachment B), a joint letter submitted on behalf of the Council on Public Higher Education (Attachment C), and a joint letter on behalf of the University of Missouri system (Attachment D). All three letters share similar concerns—that SCC's proposal does not meet the conditions set forth in the statute found at 163.191 RSMo related to a change in the level of education required in the field and the feasibility of collaboration. The following salient points are summarized from the three letters:

- **Pathways to accreditation and licensure remain the same.** The Accreditation Council for Occupational Therapy Education (ACOTE) will continue to accredit the associate degree, while adding the option of the bachelor's program. ACOTE will continue to offer a dual pathway to the degree for the foreseeable future.
- **Level of education for employment remain the same.** The only requirement for licensure is that students graduate from an ACOTE-accredited school; bachelor-level and associate-level students will take the same licensure examination. There is no evidence that licensure in the field cannot be obtained with the associate degree, indicating that the degree will still provide value in the marketplace.
- **Collaboration has not been explored.** All three letters state that SCC has not reached out to university partners in the state regarding the possibility of collaboration.

SCC will be presenting their proposal and answering questions at the Academic Affairs and Workforce Needs Committee meeting scheduled for December 10, 2019. The four-year chief academic officers and presidents have been invited to attend the committee meeting.

¹ 6 CSR 10-4.010 Submission of Academic Information, Data and New Programs

RECOMMENDATION

This is an Information item only.

ATTACHMENTS

- A. St. Charles Community College Proposal for Bachelor of Applied Science in Occupational Therapy Assistant
- B. Joint Comments submitted by Statewide Four-Year Chief Academic Officers
- C. Joint Comments submitted by the Council on Public Higher Education
- D. Joint Comments submitted by the University of Missouri System

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", written over a circular stamp or seal.

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

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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) 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 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

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 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 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 "maximize 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.

St. Charles Community College	\$21,240.00
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 cursive script, appearing to read "Steve Ehlmann".

Steve Ehlmann
County Executive
St. Charles County Government

27 June, 2019

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

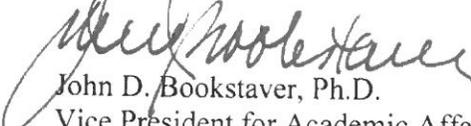
Dear Ms. Mulligan:

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,



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:

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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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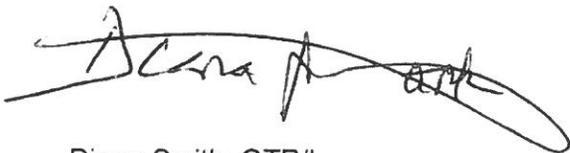
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Sincerely,

A handwritten signature in black ink, appearing to read "Diana Smith", with a large, sweeping flourish extending to the right.

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

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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

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,

Katherine Mauer
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

Missouri Statewide 4-year Chief Academic Officers

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

July 31, 2019

Re: St. Charles Community College Bachelor of Applied Science in Occupational Therapy Assistant Degree Proposal

Dear Commissioner Mulligan,

Collectively, the Chief Academic Officers at the public four-year institutions in Missouri are writing in response to the request from St. Charles Community College (SCCC) to offer a bachelor's degree in Occupational Therapy Assistant (OTA). It is our strongly shared consensus that this proposal fails to meet the requirements of the recently adopted policy regarding the comprehensive review process, codified in RSMo 163.191. Two elements outlined in this rule and discussed below are of particular concern and thus, we must request that the proposal be removed from consideration.

The first element necessary for approval is a **change in the required level of education**. RSMo 163.191 states "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..."

The accrediting body for OTA, the Accreditation Council for Occupational Therapy Education (ACOTE), recently added the option of accrediting bachelor's programs in OTA. However, they continue to accredit associates' programs and anticipate that they will continue this parallel/dual system for the foreseeable future. Thus, the minimum requirements for accreditation remain unchanged.

Furthermore, state licensure standards do not require the bachelor's degree. Rather, they simply require that the individual be a graduate of an ACOTE accredited program – which may be at either degree level. Thus, this degree proposal does not meet the first stipulation that there be a change in the required level of education.

The second element necessary for approval is that **collaboration with a university is not feasible** (RSMo 163.191). The University of Missouri has a strong track record of collaboration in the area of OTA education through the Missouri Health Professions Consortium (MHPC). While SCCC reached out to University of Missouri St. Louis in their planning process, it is unfortunate that they did not reach out to either the University of Missouri or Missouri State University about potential collaboration as both universities offer occupational therapy programs. It is our understanding that the University of Missouri stands ready to collaborate with SCCC on this new degree option, as they already have the qualified faculty and infrastructure in place to make such a collaboration financially viable.

We value the crucial and unique role played by our community college partners in our efforts to effectively and affordably educate students. We continue to work diligently to ensure that our work is aligned with theirs and look forward to finding ways to collaborate on this and other degree programs that address the needs of our state. We are “better together” and believe that collaboration will ultimately serve students best. Again, based on the fact that RSMo 163.191 was not adhered to with regards to this proposal from SCCC we respectfully request that the proposal be removed from consideration.

Sincerely,

Phil Bridgmon
Provost, University of Central Missouri

Paula Carson
Provost and Vice President for Academic Affairs, Missouri Southern State University

Doug Davenport
Provost and Vice President for Academic Affairs, Missouri Western State University

Frank Einhellig
Provost, Missouri State University

Mike Godard
Provost, Southeast Missouri State University

Janet Gooch
Executive Vice President for Academic Affairs and Provost, Truman State University

Steve Graham
Associate Vice President for Academic Affairs, University of Missouri System

Jamie Hooyman
Provost, Northwest Missouri State University

John Jones
Provost and Vice President for Academic Affairs, Lincoln University



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Mohammad Dehghani
Chancellor
Missouri S&T
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Kristin Sobolik
Interim Chancellor
University of Missouri-St. Louis
St. Louis, MO 63121

October 30, 2019

Commissioner Zora Mulligan
Missouri Department of Higher Education and Workforce
Development
P.O. Box 1469
Jefferson City, MO 65101

Dear Commissioner,

On behalf of the 14 public university Presidents and Chancellors of COPHE, I am writing in regard to St. Charles Community College's proposal to offer an Occupational Therapy Assistant (OTA) degree at the bachelor's level. More to the point, I'm writing to urge you and the Coordinating Board of Higher Education to uphold the requirements that were put in place for new degree program approval through HB1465/SB 807 (2018) and are found in 163.191 RSMo.

This statute clearly outlines that in the case of community colleges seeking to offer bachelor's degrees, two main criteria must be satisfied before the program can move forward to a comprehensive review. The first is that a bachelor's degree be required for licensure in the relevant occupation. And secondly, that after all options for collaboration with public universities have been explored, no feasible option can be found. Neither of these criteria have been met in this case. Therefore, this program does not meet the legal standards to be approved and should not be placed into a review process.

The Accrediting Council for Occupational Therapy Education (ACOTE) has clearly stated that they will continue to accredit associate level programs. In addition, there is no evidence whatsoever that licensure in this field cannot be obtained with the associate's degree, and thus that degree will still provide value in the marketplace for graduates that hold it.

St. Charles Community College has not made meaningful efforts to seek collaboration with the public universities that have the existing infrastructure to cooperatively offer the bachelor's degree in this

field. In fact, the University of Missouri, for one example, stands ready to collaborate with community college partners in this field.

Furthermore, the University of Missouri has gone the extra mile to propose new OTA program options that are specifically designed to foster the type of collaborative relationship that is called for in this situation. That proposal has been submitted to your department and represents exactly the type of initiative that was envisioned with the streamlined and improved academic program review process.

We strongly urge you and the Coordinating Board of Higher Education to uphold the letter and spirit of the law and the reforms on which we all worked so diligently to develop and implement.

Thank you for taking time to listen to St. Charles Community College as you visit them in the near term. Your office has received numerous communications from the University of Missouri on this topic. I ask that you please take time as your schedule permits to visit the University of Missouri for a listening session as well. Please do not hesitate to contact me as the COPHE chair to discuss this issue and how we can collectively work together to ensure the statute is followed.

Thank you,

A handwritten signature in cursive script that reads "John Jasinski". The ink is dark and the signature is fluid and legible.

John Jasinski, COPHE chair

July 12, 2019

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

Re: St. Charles Community College (SCCC) Baccalaureate Degree Request

Dear Commissioner Mulligan,

Thank you for the opportunity to respond regarding St. Charles Community College's (SCCC) proposal to transition their current occupational therapy assistant (OTA) associate degree program to a bachelor's level program. Under current Missouri law community colleges are allowed to offer bachelor's degree programs if very specific conditions are met. Given our understanding of the statute, SCCC's proposal does not meet the identified conditions, and approving it would lower the bar in such a way that renders those conditions obsolete.

Condition 1: Changes in the required level of education

RSMo. § 163.191: "Community college course offerings ... 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 increases to that level..."

RSMo. §163.191 specifies as one of the conditions that needs to be met in order for a community college to offer a bachelor's degree is that the "level of education required in a field for accreditation or licensure increases to the baccalaureate degree level..." As it relates to SCCC's proposal no such requirement exists. Since 2008 the professional accrediting body for occupational therapy (OT) education, the Accreditation Council for Occupational Therapy Education (ACOTE), has required all OTA programs in the United States to be at the associate's degree level. As the profession of OT has expanded and matured so have the standards for OTA education. To accommodate the increasing complexity and prevalence of OT services, ACOTE voted in August 2015 to begin the process of accrediting OTA programs at both the associate and bachelor's degree levels; however, this does not prevent associate programs from acquiring ACOTE accreditation. In fact, ACOTE has now stated that it is its intention to continue accrediting both degree levels for some time. At the state level, Missouri licensure requirements for OTAs state that a graduate of any ACOTE accredited program—including associate and bachelor's programs—can apply for a license as an OTA.



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It is possible that, in a future state, ACOTE will decide to move to a single point of entry and only accredit bachelor's degree OTA programs. However, even if this decision were made tomorrow, there would be at minimum a 10-15 year phase-in period, consistent with every previous degree change there has been in the profession. In summary, there are currently no accreditation or licensure requirements for OTA's to hold a bachelor's degree, and that is unlikely to change in the near future.

Condition 2: Lack of collaborating four-year institutions

RSMo. § 163.191: "Community college course offerings ... may include baccalaureate degrees only when authorized by the coordinating board for higher education in circumstances ... [when] collaboration with a university is not feasible..."

Another stipulation in specified in the statute is that "collaboration with a university is not feasible ...". The University of Missouri has a strong history of collaboration with community colleges in the state of Missouri regarding OTA education. The Missouri Health Professions Consortium (MHPC) has been in existence for many years at the University of Missouri and has offered an OTA associate's degree program to a consortium of six community colleges serving communities as far north as North Central Missouri College in Trenton and as far south as Three Rivers College in Popular Bluff. MHPC provides clear demonstration that collaboration between University of Missouri and community colleges in the state is feasible, specifically around OTA education.

Additionally, while no bachelor's level OTA program currently offered in the state, this is not for a lack of interest. Rather, ACOTE accreditation standards were just approved in the fall of 2018 and academic programs were able to begin submitting letters of intent to the organization to offer bachelor's OTA programs in January 2019. Four-year institutions should be afforded the opportunity to adapt to these very recent changes in professional standards. The University of Missouri currently has been working on a proposal for an OTA bachelor's degree, which is currently under review by the Provost's office. We have also submitted our letter of intent to ACOTE to establish this program. We have specifically described plans for community college collaboration, including but not limited to developing a pathway for community college transfers, exploring distance learning opportunities, and potentially establishing satellite programs on community college campuses.

Furthermore, while it is our strong intent to collaborate with community colleges related to offering our bachelor's OTA degree, SCCC has not reached out to us about a collaboration. To our understanding of the statute, SCCC should be required to reach out to four-year institutions that currently have the capacity to offer the bachelor's degree.

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In its proposal, SCCC argues that since they are a transitioning program they can bypass the waitlist for ACOTE accreditation which would allow them to start a program quicker. While this is true ACOTE is voting on a new policy in July 2019 that would allow any existing OT program, which would include University of Missouri, that is applying for candidacy to start a bachelor's OTA program to also bypass this waitlist. This would allow University of Missouri to have a program in place as quickly if not quicker than SCCC. It is our strong intent to collaborate with community colleges related to offering our bachelor's OTA degree however SCCC has not reached out to us about collaboration with this program which to our understanding is required by §163.191.

Thank you again for the opportunity to respond. Please let me know if you have other questions or would like to discuss further. We are looking forward to continuing our development of the bachelor's OTA program and working collaboratively with the community colleges to offer this degree.

Best wishes,

Mun Y. Choi, Ph.D.
President of the University of Missouri System

Alexander Cartright, Ph.D.
Chancellor of the University of Missouri—Columbia

Kristofer Hagglund, Ph.D.
Dean, School of Health Professions
University of Missouri—Columbia

Timothy J. Wolf, Ph.D.
Associate Professor and Chair
Department of Occupational Therapy, School of Health Professions
University of Missouri—Columbia