# GUIDELINES AND POLICY STATEMENTS

# VI. D. INACTIVE STATUS

### **INACTIVE STATUS POLICY**

Inactive status is a special status applied only to programs that are not currently enrolling new students and do not plan to enroll new students in the future. Programs that continue to enroll students, even when the frequency of admissions is reduced (e.g., from once a year to every other year), do <u>not</u> need to request that the program be placed on inactive status.

Inactive status does not replace the program's current accreditation status. The designation follows the regular accreditation status (e.g., Accreditation-Inactive or Probationary Accreditation-Inactive). Students graduating from a program with a status of Accreditation-Inactive or Probationary Accreditation-Inactive are considered graduates of an accredited program. A program may remain on inactive status for a maximum of 3 years dependent upon the accreditation term remaining. During that time, programs with a status of Accreditation-Inactive or Probationary Accreditation-Inactive remain responsible for submission of Annual and Inactive Status Reports to the Accreditation Council for Occupational Therapy Education (ACOTE®) and must pay the annual accreditation fee. Programs on Inactive Status are not required to complete an Interim Report. A program may request Inactive Status only once within the assigned accreditation term (e.g., 5, 7, or 10 years).

Written requests to change the program's status to inactive must be signed by the CEO of the institution and the program director. Requests should be addressed to ACOTE, c/o the AOTA Accreditation Department, and include the information listed under "Procedures for Requesting Inactive Status". Decisions to place a program on inactive status become effective on the date the decision becomes final. Once a program is placed on inactive status, no new students may be admitted into the program until an Application for Reactivation/Candidacy Application is submitted and ACOTE grants a status of Accreditation or Accreditation-Reactivating. A program may request reactivation at any time during the 3-year period of inactive status by following the process outlined under "Procedure for Requesting Reactivation."

If the program chooses not to reactivate, the program may request voluntary withdrawal of accreditation. If a request is not received prior to the end of 3 years or prior to the expiration of the accreditation term (whichever is sooner), the status of an accredited program will be changed from Accreditation-Inactive or Probationary Accreditation-Inactive to Involuntary Withdrawal of Accreditation.

### PROCEDURE FOR REQUESTING INACTIVE STATUS

Written requests to change the program's status to inactive must be signed by the CEO of the institution and the program director and addressed to ACOTE. The letter and any supporting documentation must be submitted through ACOTE Online (<a href="https://acote.aota.org">https://acote.aota.org</a>) using the "Substantive Change" tab. Requests must include information regarding:

- How the institution plans to continue the program while on inactive status (e.g., teach out current students, increase recruitment efforts, etc.)
- Anticipated plans for the program at the end of the 3-year period (e.g., whether the program plans to close or reactivate).
- If the program plans to close, a teach-out plan that ensures equitable treatment of the remaining students. The plan must specify:
  - the number of students remaining in the program and their status in the program;
  - a teach-out agreement that ensures that all current students complete all aspects of the program within 3 years;
  - a provision for notification to the students of any additional costs;
  - resources, including faculty, for ensuring a quality education for the remaining students in the program; and
  - how the inactive status will be disclosed to students in the program as well as to prospective applicants.

Upon receipt, the request for inactive status will be forwarded to the ACOTE reviewers assigned to the program. If the request for inactive status includes a request for delay of an on-site evaluation visit, the request will be considered in accordance with ACOTE Policy V.C. Delay of On-Site Evaluation. A letter indicating the final decision will be sent to the CEO, dean, and program director with a copy to the U.S. Department of Education, the State licensing board, and the institutional accrediting agency within 10 business days of ACOTE's decision. If inactive status is granted, it will become effective on the date the decision became final, as stated in the letter. Programs will be required to provide updated inactive status reports as requested by ACOTE.

### REPORTING REQUIREMENTS WHILE ON INACTIVE STATUS

Programs with a status of Accreditation-Inactive or Probationary Accreditation-Inactive remain responsible for submission of the Annual Report and regular Inactive Status Reports as requested by ACOTE.

At a minimum, Inactive Status reports must include information on the number of students remaining in the program, their status in the program, and resources (including faculty), for ensuring a quality education for those remaining students. At ACOTE's discretion, programs on inactive status that are carrying areas of noncompliance may also be required to report on any progress made toward correcting the cited areas.

# PROCEDURE FOR REQUESTING REACTIVATION

A request to reactivate accreditation must be submitted in writing 12 months prior to the planned enrollment of students. The letter and any supporting documentation must be submitted through ACOTE Online (https://acote.aota.org) using the "Substantive Change" tab.

The letter of intent to request reactivation must be addressed to ACOTE, c/o the AOTA Accreditation Department, and signed by (1) the chief executive officer of the sponsoring institution and (2) the occupational therapy program director AND/OR dean overseeing the proposed program. (Although signature of the occupational therapy program director is not required on the letter of intent, it is strongly recommended that the program director be hired in sufficient time to be instrumental in preparing the Application for Reactivation/Candidacy Application.) The request must:

- declare the intention of the institution to reactivate the occupational therapy or occupational therapy assistant educational program, and
- state that the institution agrees not to admit students into the occupational therapy or occupational therapy assistant program until ACOTE grants a status of Accreditation or Accreditation-Reactivating.
- Indicate:
  - the degree level of the program;
  - the month and year the first class is projected to enter the program;
  - the month and year the first class is projected to begin Level II fieldwork and for doctoral programs, the doctoral capstone;
  - the month and year the first class is projected to graduate; and
- the year the first graduates are projected to sit for the National Board for Certification in Occupational Therapy (NBCOT) certification examination.

## APPLICATION FOR REACTIVATION/CANDIDACY APPLICATION

Upon receipt of the request for reactivation, AOTA Accreditation Department staff will provide access to the Application for Reactivation/Candidacy Application and a preliminary timeline for the reactivation process.

The Application for Reactivation/Candidacy Application must be electronically signed by the occupational therapy program director, the dean overseeing the proposed program, and the chief executive officer of the sponsoring institution.

### APPLICATION REVIEW

Upon submission, the Application for Reactivation/Candidacy Application will be reviewed and one of the following decisions will be made at the next ACOTE meeting:

- <u>GRANT</u> a status of ACCREDITATION on the basis of the application review, extend the status until action is taken on the next regularly scheduled on-site evaluation, and notify the program that students may be admitted into the program.
- <u>GRANT</u> a status of ACCREDITATION—REACTIVATING, notify the program that students may be admitted into the program, and SCHEDULE A FULL ON-SITE of the program.
- <u>GRANT</u> a status of **ACCREDITATION**—**REACTIVATING**, notify the program that students may be admitted into the program, and **SCHEDULE A FOCUSED ON-SITE** of the program to assess specific areas identified by ACOTE.
- <u>DEFER ACTION</u> on the request for reactivation, request additional information for review at a subsequent ACOTE meeting, and notify the program that students may NOT be admitted into the program until ACOTE grants a status of Accreditation or Accreditation—Reactivating.
- <u>DENY</u> a status of **ACCREDITATION**—**REACTIVATING** and notify the program that students may NOT be admitted into the program.

If the application documents sufficient compliance with the applicable ACOTE Accreditation Standards, the action will be to GRANT a status of Accreditation or Accreditation—Reactivating. As soon as the institutional officials receive written notification from ACOTE that the program has been granted Accreditation or Accreditation—Reactivating status, they may admit students into the program according to the approved timeline and proceed with plans for the on-site evaluation (if scheduled). AOTA will officially list the program as having a status of Accreditation or Accreditation-Reactivating.

If the application materials are insufficient to allow ACOTE to determine compliance with the applicable ACOTE Accreditation Standards, ACOTE will DEFER ACTION on the request for reactivation and request additional information for review at a subsequent ACOTE meeting. A program may have action on the Application for Reactivation/Candidacy Application deferred a maximum of two times.

The program will be DENIED a status of Accreditation—Reactivating if the program does <u>not</u> document sufficient compliance with the applicable ACOTE Accreditation Standards. If a status of Accreditation—Reactivating is denied, the program will <u>not</u> be able to admit students. Clearly delineated procedures for programs wishing to appeal an action of Denial of Accreditation—Reactivating are described in <u>ACOTE Policy IV.D. Appeals Process</u>. Options for programs denied a status of Accreditation—Reactivation include the following:

- If the program is still within the 3-year period for Inactivation, the program will remain on inactive status and may reapply for Accreditation—Reactivating by submitting a new request for reactivation.
- If the program is beyond the 3-year period for Inactivation, the program's status will be changed to Accreditation Withdrawn. The program may apply for accreditation through the initial accreditation process described in ACOTE Accreditation Manual Section III.A. Applicable fees would be assessed.

## SAMPLE STATEMENTS FOR INACTIVE PROGRAMS

A program placed on a status of Accreditation-Inactive may use the following sample statements when publishing the accreditation status of the program:

The occupational therapy / occupational therapy assistant program has been granted a status of Accreditation-Inactive by the Accreditation Council for Occupational Therapy Education (ACOTE) of the American Occupational Therapy Association (AOTA), located at 6116 Executive Boulevard, Suite 200, North Bethesda, MD 20852-4929. ACOTE's telephone number c/o AOTA is (301) 652-AOTA and its Web address is <a href="www.acoteonline.org">www.acoteonline.org</a>. This status indicates that the program is not currently enrolling new students and does not plan to enroll new students in the future. While the program is on Accreditation-Inactive status, the graduates of the program will be eligible to sit for the national certification examination for the occupational therapy assistant administered by the National Board for Certification in Occupational Therapy (NBCOT). After successful completion of this exam, the individual will be a Certified Occupational Therapy Assistant (COTA). In addition, all states require licensure in order to practice; however, state licenses are usually based on the results of the NBCOT Certification Examination. Note that a felony conviction may affect a graduate's ability to sit for the NBCOT certification examination or attain state licensure.

## ACCREDITATION—REACTIVATING

Programs that have been granted a status of Accreditation—Reactivating must have a qualified occupational therapy program director on staff throughout the reactivation process. Students shall not be admitted to the program unless there is a qualified occupational therapy program director on staff.

# **ACCREDITATION FEES**

Should an on-site evaluation be required during the reactivation process, the program will be responsible for all costs related to the accreditation visit (actual expenses for travel and per diem of the on-site team).