



Interpretive Guide: 2018 ACOTE Standard A.5.3 PROGRAM LENGTH

Background: USDE Recognition Review

- ACOTE® is currently undergoing US Department of Education (USDE) recognition review.
 - This recognition allows accredited programs to be eligible to participate in federal programs that lead to federal student aid funds.
- During this review, USDE found that ACOTE is not sufficiently evaluating whether programs conform to “commonly accepted academic standards”. 602.17(a)

Background: USDE 602.17(a) Criteria

- “The agency must have effective mechanisms for evaluating an institution’s or program’s compliance with the agency’s standards before reaching a decision to accredit or preaccredit the institution or program.”

“The agency meets this requirement if the agency demonstrates that it (a) evaluates whether an institution or program ... (3) maintains requirements that at least confirm to commonly accepted academic standards, or the equivalent,”
- (Read full regulatory requirement at <https://www2.ed.gov/admins/finaid/accred/accreditation-handbook.pdf>)

Background: USDE Concerns with 602.17(a)

- Staff Analyst's Finding: The agency must provide additional information and documentation to demonstrate that it evaluates whether a program maintains requirements that at least conform to commonly accepted academic standards or the equivalent.
 - ACOTE is the expert for assuring entry level educational quality. Institutional rationale is not sufficient, on its own, to determine this standard.
 - ACOTE must provide guidance to programs related to commonly accepted academic standard [for degree] and evaluate whether a program conforms to that.
 - A result of the current approach to evaluating this is the variability in length of programs within a degree level.

Interpretive Guide:

A.5.3 PROGRAM LENGTH

Guidance for all program levels:

- ACOTE has adopted this interpretive guide that is informed by the [National Center for Education Statistics \(NCES\)](#). (Institute of Education Sciences: NCES – statistics, research, and evaluation arm of the USDE)
- Program length must be reflective of this ACOTE defined commonly accepted academic standards for degree levels in occupational therapy.
- The program should additionally consider the following factors:
 - institutional accrediting and state agencies
 - institutional policy
 - program’s curriculum design.

Doctoral Degree Level

Current Standard

The occupational therapy doctoral degree must be awarded after a period of study such that the total time to the degree, including both preprofessional and professional preparation, equals a minimum of 6 FTE academic years. The program must document a system and rationale for ensuring that the length of study of the program is appropriate to the expected learning and competence of the graduate.

Interpretive Guide

An entry-level professional degree awarded for successful completion of a program of study as an occupational therapist, including both preprofessional and professional preparation, **equaling at least 6 full-time-equivalent academic years** to provide the knowledge and skills for the recognition, credential, or license required for professional practice. Any variation from these limits must be explained and justified.

Master's Degree Level

Current Standard

The program must document a system and rationale for ensuring that the length of study of the program is appropriate to the expected learning and competence of the graduate.

Interpretive Guide

An entry-level professional degree awarded for successful completion of a program of study as an occupational therapist, including both preprofessional and professional preparation, **generally requiring at least 5 full-time-equivalent academic years, but no more than 6 full-time-equivalent academic years. One or two years must be full-time college-level study beyond the bachelor's degree to provide the knowledge and skills for the recognition, credential, or license required for professional practice.** Any variation from these limits must be explained and justified.

Baccalaureate Degree Level

Current Standard

The program must document a system and rationale for ensuring that the length of study of the program is appropriate to the expected learning and competence of the graduate.

Interpretive Guide

An entry-level occupational therapy assistant degree granted for the successful completion of a baccalaureate program of study, **usually requiring at least 4 years (or equivalent) of full-time college-level study** to provide the knowledge and skills for the recognition, credential, or license required for professional practice. Any variation from these limits must be explained and justified.

Associate Degree Level

Current Standard

The program must document a system and rationale for ensuring that the length of study of the program is appropriate to the expected learning and competence of the graduate.

Interpretive Guide

An entry-level occupational therapy assistant degree granted for the successful completion of an associate's program of study, **usually requiring at least 2 years (or equivalent) of full-time college-level study** to provide the knowledge and skills for the recognition, credential, or license required for professional practice. Any variation from these limits must be explained and justified.

Considerations

- [NCES](#): Definition of Full Time Enrollment – elements include undergraduate versus graduate status; enrollment during “academic year” versus additional sessions.
- Institutional Definition of Academic Year – often defined by semesters (e.g. fall and spring), months (e.g. September – June), or weeks; additional sessions (e.g. summer term, j-term) may be applicable
- Federal Definition of a Credit Hour – perhaps as interpreted by the institutional accreditor.

Considerations

- Policies on Dual or Concurrent Degrees (e.g. having some credits count toward completion of a baccalaureate degree and count within a graduate program).
- Understanding and analyzing how experiential hours (e.g. for clinical or fieldwork) are translated into assigned credit or unit measurements.

Timeline

- **Compliance with this program length requirement will be assessed with reports submitted after 8/1/2022.**
- The current procedure for correcting an area of noncompliance applies.
 - Programs have up to 2 years to fix an AON, depending upon program length, and will submit a plan of correction/progress reports during that timeframe.
 - An extension “for cause” for increased time to address an AON may be approved if the program shows evidence of progress toward meeting the standard.

Moving Forward

- The AOTA Accreditation Department is available to discuss program specific questions (accred@aota.org).
- AOTA Inspire Session: April 1 1:00-3:00
- Please respond to the Educational Standards Review Committee calls for comment!!
 - The ESRC will explore entry-level competencies needed at each degree level as a priority.
 - The ESRC will continue to analyze program length data.

Questions? Concerns?

