

DR. STEVEN GENTILE
INTERIM EXECUTIVE DIRECTOR



BILL LEE
GOVERNOR

STATE OF TENNESSEE
HIGHER EDUCATION COMMISSION
STUDENT ASSISTANCE CORPORATION
312 ROSA L. PARKS AVENUE, 9TH FLOOR
NASHVILLE, TENNESSEE 37243
(615) 741-3605

TO: Bernie Savarese, Acting Vice President for Academic Affairs, Research, & Student Success
University of Tennessee System

FROM: Julie A. Roberts, Chief Academic Officer
Tennessee Higher Education Commission

SUBJECT: University of Tennessee, Health Science Center
Letter of Notification: Occupational Therapy Doctorate (OTD)

DATE: October 11, 2023

Thank you for the submission of the Letter of Notification (LON) for the Occupational Therapy Doctorate (OTD) program. Per THEC Policy A1.0 New Academic Programs: Approval Process, the LON is evaluated on the following criteria: alignment with state master plan and institutional mission; feasibility; institutional capacity to deliver the proposed academic program; and program costs and revenues.

After reviewing the revised LON, I approve UTHSC's plan to develop the New Academic Program Proposal (NAPP) for the Occupational Therapy Doctorate. As UTHSC continues to develop the proposed program, all concerns italicized on the attached LON evaluation must be reflected in the NAPP. It is understood the proposed program will be developed in accordance with the mission of UTHSC and will meet the Master Plan for Tennessee Postsecondary Education 2015-2025 degree completion and workforce development objectives.

Attachment

cc: Randy Boyd, UT System, President
Steven Gentile, THEC, Interim Executive Director
Cindy Russell, UTHSC, Vice Chancellor for Academic, Faculty, and Student Affairs
Karen Galicia, UT System, Director of Academic Affairs
Steven Alway, UTHSC, Dean of the College of Health Professions
Ryan Korstange, THEC, Director of Academic Affairs

Tennessee Higher Education Commission
Letter of Notification Evaluation
October 11, 2023



The evaluation of the Letter of Notification (LON) is in accordance with the THEC Policy A1.0 New Academic Programs: Approval Process. The evaluation is conducted by interested parties and THEC staff. The LON is posted on the THEC website for a 15-day period of comment by interested parties. Based on the internal and external evaluation, THEC will make a determination to support, not to support, or defer a decision based on a revised LON.

Institution: University of Tennessee, Health Science Center	LON Submission Date: August 2, 2023 LON Resubmission: September 22, 2023
Academic Program, Degree Designation: Occupational Therapy Doctorate (OTD) Concentration(s): N/A	
Proposed CIP Code and Title: 51.2306 (Occupational Therapy/Therapist)	
Proposed Implementation Date: August 2024	
Time Period Posted on Website for Public Comment: August 3 – August 17, 2023	
Academic Program Liaison(s): Karen Galicia, Director of Academic Affairs, UT System, etzkorn@tennessee.edu , 865.2104 Stephen Alway, Professor and Dean, College of Health Professions, UTHSC, salway@uthsc.edu	

Note: Comments in italics within this document should be addressed in the New Academic Program Proposal (NAPP).

Letter of support from President/Chancellor	<ul style="list-style-type: none"> A signed letter of support written by Bernie Savarese, dated July 31, 2023, was included with the proposal. A memo addressed to President Boyd, written by Chancellor Buckley, and dated July 6, 2023 was included.
Section II: Background	
Background on academic program development	<ul style="list-style-type: none"> The UTHSC College of Professions has offered an Occupational Therapy, BS since the 1980's. The program transitioned to a Master of Occupational Therapy (MOT) degree in 2007. The proposed OTD is a 29 month, 95 credit hour program, that will provide graduates with the in-depth education and firsthand experience to fill more complex and robust roles in clinical practice. Graduates will also be prepared for positions in research, emerging practice areas, program development, and for the application of interdisciplinary theoretical perspectives. In this regard, the program will supplement the current MOT. The Accreditation Council for Occupational Therapy Education (ACOTE) has recently required that MOT programs be no more than 24 months in duration. In response, UTHSC has approved a new MOT curriculum that will start in Fall 2024, reducing the

	<p>current 95 credit hour program to 76 credits, which will take students 24 months to completion. This transition will allow faculty the necessary time to implement the proposed OTD program.</p>
<p>Purpose and nature of academic program</p>	<ul style="list-style-type: none"> ▪ The proposed program is a 95 credit, 29-month program of study that will be delivered traditionally and will require full-time enrollment. The proposed curriculum provides instruction in clinical practice, research, leadership, administrative skills, and program and policy development. The training also includes Level 1 and Level 2 fieldwork placements, and a capstone project. This curriculum has been designed to fulfill ACOTE's professional standards (see Appendix E for a breakdown). ▪ Students will qualify for admission to the program after completing a bachelor's degree, or after completing the first term of UTHSC's MOT program. ▪ The proposed program will also include a professional development evaluation process to socialize students into the values and expectations of the profession. This process will require that students meet with an academic advisor every semester to demonstrate their proficiency in criteria related to the curriculum outcomes. Students will identify professional and personal strengths and weaknesses, receive faculty feedback, and develop goals to facilitate their progress in professional development. ▪ Students will complete volunteer experiences which will promote awareness of and engagement in initiatives to meet the needs of the community, as well as align with the Department of Occupational Therapy's mission.
<p>Alignment with State Master Plan and Institutional Mission</p>	<ul style="list-style-type: none"> ▪ The proposed OTD program aligns with the State's master plan for higher education, by increasing the number of postsecondary degrees in the state. The program will connect with college advisors in high schools and with existing UTHSC pre-admissions programs to make sure potential students are aware of the value of this proposed degree. ▪ UTHSC's proposed OTD can be completed in a shorter timeframe than existing OTD programs in Tennessee. This shortened timeframe renders the proposed program a more affordable option for an OTD, and coheres with the state master plan's emphasis on family prosperity by creating an affordable pathway to an in-demand doctoral degree. ▪ The proposed OTD program aligns with the UTHSC mission of "transforming lives through inclusive education, research/scholarship, clinical care, and public service." Specifically, the proposed program will offer students the opportunity for collaborative learning experiences in the Center for Healthcare Improvement and Patient Safety (CHIPS), will require a capstone experience resulting in professional presentations or publications, and will create public service opportunities in the Rachel Kay

	<p>Stevens Therapy Clinic where, under the supervision of a licensed occupational therapist, students will provide consultation, evaluation, individual treatment, and parent/family education.</p> <ul style="list-style-type: none"> ▪ The proposed program is consistent with Strategic Priority 1, initiative 1.3 of the UTHSC College of Health Professions strategic plan, which is to “develop new graduate programs.” Further, the proposed OTD integrates well with other clinical doctorates offered in the COHP, including the Doctor of Physical Therapy and Clinical Doctorate in Audiology.
<p>Institutional capacity to deliver the proposed academic program</p>	<ul style="list-style-type: none"> ▪ The proposed OTD will utilize faculty, courses, educational resources, laboratory equipment, clinical placement, and integrated research opportunities that already exist because of the current MOT. ▪ A recent ACOTE change required the reduction of the MOT by one term and 20 credit hours. This change will be implemented in Fall 2024 and will leave the faculty and non-instructional staff with capacity to implement the proposed OTD. The last cohort of MOT students in the current five-term curriculum will graduate in May 2025, resulting in one year of overlap between the new and old curricula, and providing additional faculty capacity after. ▪ The curriculum will make use of innovative teaching practices enabled by UTHSC’s Center for Health Improvement and Patient Simulation (CHIPS). ▪ OTD students will also participate in fieldwork experiences at medical facilities with which UTHSC has established affiliation agreements. ▪ The Department of Occupational Therapy’s physical space was recently renovated and is sufficient to support both the MOT and the ODT, as well as to accommodate future growth in both programs.
<p>Existing programs offered at public and private Tennessee institutions</p>	<ul style="list-style-type: none"> ▪ Occupational Therapy Doctorate programs are currently offered at two public universities in Tennessee: University of Tennessee, Chattanooga (UTC) and East Tennessee State University (ETSU). UTC’s program has graduated approximately 65 students in the past three years. ETSU’s program was approved in May 2021, and has not graduated any students yet. ▪ UTHSC currently offers an MOT, and while the campus anticipates some impact on the enrollment in that program if the DOT is approved, they believe that the MOT will remain in high enough demand and growing enrollment in the DOT will offset any enrollment declines. ▪ In addition, OTD programs are offered at two private institutions in Tennessee: Belmont and Lincoln Memorial. Belmont has graduated about 105 students over the past three years. Lincoln Memorial has not graduated students yet.

Accreditation	<ul style="list-style-type: none"> ▪ UTHSC submitted a letter of intent to the Accreditation Council for Occupational Therapy Education (ACOTE) in 2020. ▪ UTHSC's candidacy application is due to ACOTE by December 15, 2023. Review of this application will be completed by March 2024, and if approved, the first class of students could be admitted in Fall 2024. An initial self-study report would be due July 2025, reviewed by December 2025, with an onsite evaluation occurring between April – June 2026, and the final ACOTE accreditation decision will be rendered in August 2026.
Administrative Structure	<ul style="list-style-type: none"> ▪ An Organizational Chart is included as appendix D. ▪ The program will be directed by the Chair of the Occupational Therapy Department, who reports to the Dean of the College of Health Professions.
Section III: Feasibility Study	
Student interest	<ul style="list-style-type: none"> ▪ A market analysis was completed by the Hanover Research Group, and is attached in Appendix C. The analysis highlights the tripling of OTD degree conferrals over four years. The growth of OTD programs is in distinction to consistently dropping enrollment in master's level programs in occupational therapy. ▪ External and internal stakeholder input reflects a strong interest in a UTHSC OTD program. . ▪ Pre-health students at the University of Memphis, UTK, and UTM were surveyed in November 2021 to gauge their interest. Roughly 80 percent of the 70 respondents reported interest in the UTHSC OTD.
Local and Regional Demand	<ul style="list-style-type: none"> ▪ Data from the Hanover analysis suggests that employment in Occupational Therapy positions is projected to grow by 17.6 percent between 2018 and 2028. ▪ The US Bureau of Labor Statistics projects a 16 percent increase in the job outlook for the profession from 2019-2029, which reflects a much faster than average growth. The 2021 Academic Supply and Occupational Demand Report positions occupational therapy as a top 15 high demand occupation in the Southwest Tennessee Region. The Supply and Demand report also lists postsecondary health specialty instructors as a high-demand occupation. ▪ Accessibility to and awareness of occupational therapy have grown following the Affordable Care Act, expanding patient use and thereby increasing the need for qualified occupational therapists. ▪ The prospects for graduates of the proposed OTD program are excellent in West TN. A survey of job postings conducted in September 2023 showed 293 open clinical occupational therapy positions in Tennessee. A regional survey (TN, MS, AR, KY, AL, and NC) also conducted in September 2023 showed 27 open occupational therapy faculty positions.
Employer Demand	<ul style="list-style-type: none"> ▪ The US Bureau of Labor Statistics projects that employment opportunities for Occupational Therapists will increase by 16

	<p>percent through 2029, which is a must faster rate of increase than the average increase for all occupations.</p> <ul style="list-style-type: none"> ▪ In correspondence with changes in credentialing in other health professions, training in occupational therapy is moving from requiring a MOT as entry level credential to a DOT as an entry level criteria. This trend is noted by the Accreditation Council on Occupational Therapy Education (ACOTE), who reports that in September 2023, 126 new OTD programs are seeking initial accreditation vs. 32 new MOT programs. . ▪ Occupational Therapists also have high average pay – with the median new graduate salary being nearly \$85,000, and experienced Occupational Therapists earning more than \$100,000 per year.
<p>Community and Industry Partnerships</p>	<ul style="list-style-type: none"> ▪ The program has fieldwork agreements that will be sufficient to allow each student to complete the requirements for graduation. ▪ There are over 300 sites located across the United States that offer opportunities in different areas of practice and populations. ▪ Letters of Support are provided in Appendix A demonstrating a desire for the proposed degree, a willingness to hire graduates, and that the demand for graduates is sustainable. Letters have been provided by: <ul style="list-style-type: none"> ○ Bruce Keisling, Director, UTHSC Center on Developmental Disabilities. ○ Katherine Peatross, Manager of Clinical Services, Youth Villages ○ Stephanie Lancaster, Program Director UTHSC MOT. ○ Barbara Meussner, West Tennessee Healthcare Therapy and Learning Center ○ Mary Jane Matthies, Occupational Therapist, Methodist Healthcare
<p>Section IV: Enrollment and Graduation Projections</p>	
<p>Projected Enrollment and Graduates</p>	<ul style="list-style-type: none"> ▪ Enrollment and graduation projections are as follows: <ul style="list-style-type: none"> ○ Year 1: 5 enrolled, 0 graduates ○ Year 2: 10 enrolled, 0 graduates ○ Year 3: 17 enrolled, 5 graduates ○ Year 4: 23 enrolled, 9 graduates ○ Year 5: 27 enrolled, 12 graduates ○ Year 6: 30 enrolled, 14 graduates ○ Year 7: 32 enrolled, 14 graduates ▪ The program anticipates that one student will leave without completing the program about every other year. This calculation is based on enrollment trends in the existing MOT.
<p>Section V: Projected Costs to Deliver Proposed Program</p>	
<p>Faculty</p>	<ul style="list-style-type: none"> ▪ No new faculty or instructional staff will be hired. The current seven full time faculty will be adequate to deliver the program, and an existing faculty member (the department chair) has been identified as the program director

Non-Instructional Staff	<ul style="list-style-type: none"> ▪ No new administrative staff will be hired. Current administrative staff for the MOT will also support the OTD.
Graduate Assistants	<ul style="list-style-type: none"> ▪ No graduate assistants will be used.
Accreditation	<ul style="list-style-type: none"> ▪ No additional cost for SACSCOC accreditation – this proposed program is not a substantive change. ▪ ACOTE accreditation includes the following fees: <ul style="list-style-type: none"> ○ Deposit at submission of letter of intent = \$2,000 ○ Candidacy application fee = \$3,505 ○ Pre-accreditation review = \$5,505 ○ Initial on-site fee = \$5,505 ○ Annual accreditation fee = \$5,400
Consultants	<ul style="list-style-type: none"> ▪ The external review fees are projected to be \$3,500
Equipment	<ul style="list-style-type: none"> ▪ No additional equipment is necessary to support the proposed program.
Information Technology	<ul style="list-style-type: none"> ▪ No additional information technology equipment or services are necessary.
Library Resources	<ul style="list-style-type: none"> ▪ No additional library resources are needed.
Marketing	<ul style="list-style-type: none"> ▪ \$10,000 per year is included to cover marketing costs.
Facilities	<ul style="list-style-type: none"> ▪ No facilities expenses are requested. The current MOT instructional space and associated faculty offices were renovated in 2022.
Travel	<ul style="list-style-type: none"> ▪ No additional travel funds will be needed to support the program.
Other Resources	<ul style="list-style-type: none"> ▪ No other resources are requested.
Section VI: Projected Revenues for the Proposed Program	
Tuition	<ul style="list-style-type: none"> ▪ Program revenues are based on tuition and fees of \$14,022 per year for in state students and \$32,272 per year for out of state students.
Grants	<ul style="list-style-type: none"> ▪ No grant funding is anticipated.
Other	<ul style="list-style-type: none"> ▪ No other revenue is necessary to support the proposed program.
Appendices	
Letters of Support	<ul style="list-style-type: none"> ▪ Letters have been provided by: <ul style="list-style-type: none"> ○ Bruce Keisling, Director, UTHSC Center on Developmental Disabilities. ○ Katherine Peatross, Manager of Clinical Services, Youth Villages ○ Stephanie Lancaster, Program Director UTHSC MOT. ○ Barbara Meussner, West Tennessee Healthcare Therapy and Learning Center ○ Mary Jane Matthies, Occupational Therapist, Methodist Healthcare
THEC Financial Projections Form	<ul style="list-style-type: none"> ▪ The financial projections form is included as Appendix B.
Public Comment	
Public Comments Received	<ul style="list-style-type: none"> ▪ No public comment was received.