



NOTRE DAME
OF MARYLAND
UNIVERSITY

Sent via EMAIL

November 7, 2018

James D. Fielder, Jr., Ph.D.
Secretary of Higher Education
Maryland Higher Education Commission
6 N. Liberty Street, 10th Fl.
Baltimore, MD 21201

RE: NDMU Response to TU Objection – PPOTD

Dear Secretary Fielder:

Thank you for the opportunity to respond to the objection letter submitted by Dr. David Vanko, Interim Provost and Executive Vice President for Academic Affairs, on behalf of Towson University (TU) regarding Notre Dame of Maryland University's (NDMU) submission of a proposal to offer a Post-professional Occupational Therapy doctorate program (PPOTD).

NDMU received notification of TU's objection from the Maryland Higher Education Commission (MHEC) on October 25, 2018. Please note that Dr. Vanko's objection letter did not differentiate between an earlier and separate program proposal focused on preparing entry-level students to be doctorally prepared for licensure, and the current proposal focused on doctorally preparing currently licensed OTs (i.e. post-professional). As they are two separate programs, separate program approval proposals were required.

Dr. Vanko described TU's primary concern as a lack of fieldwork sites and increased competition for qualified faculty. While respectful of TU's concerns, NDMU does not believe TU has provided sufficient "detailed data and information supporting the reasons for the objection" under COMAR 13B.02.03.27(B)(5) for the objection to be considered justified by the Secretary, or that our proposed PPOTD program constitutes "unreasonable program duplication which would cause demonstrable harm to another institution" under COMAR 13B.02.03.27B(3)(c). As outlined in the following narrative and information, our program will help fulfill a critical need for additional doctorally prepared occupational therapists to meet the healthcare needs of Marylanders and actually work to address TU's faculty concerns over time.

Lack of any detailed data or information to support demonstrable harm to Towson University

COMAR 13B.02.03.27(B)(5) requires that in order for an objection to be justified, it must be "accompanied by detailed data and information supporting the reasons for the objection." While NDMU does not consider fieldwork sites or faculty as an acceptable basis for objection under

COMAR 13B.02.03.09, notwithstanding Towson's objection letter contained no qualitative or quantitative evidence to substantiate the claim of an "acute dearth of available fieldwork sites and increase[d] competition for appropriately qualified faculty..." Additionally, there was no further information suggesting there would be demonstrable harm to Towson University as required under COMAR 13B.02.03.27. **Most importantly, as enrollees would be already be licensed NDMU's PPOTD does not require service delivery focused fieldwork placements** (i.e. Fieldwork I/II in Entry Level OT programs) **so TU's objection on this point is immaterial.**

In accordance with ACOTE standards, OTD programs also contain a requirement for a doctoral capstone. The goal of the capstone is to provide "an in-depth exposure to one or more of the following: clinical practice skills, research skills, administration, leadership, program and policy development, advocacy, education, and theory development." Students are required to be mentored "by an individual with expertise consistent with the student's area of focus...the mentor does not have to be an occupational therapist" (ACOTE, pp. 43-45). Capstone experiences are sought by the student, and cooperatively arranged between student, faculty, and mentor. Capstone experiences are distinctive from the formal placement and service delivery experience associated with Fieldwork I/II and are not comparable.

Furthermore, NDMU has secured commitments and letters of support from seventeen (17) health systems, hospitals, medical centers, school systems, etc., including Lifebridge Health, Mercy, Johns Hopkins Medicine, Sheppard Pratt, Kennedy Krieger Institute, and others to serve as placement sites. Additionally, NDMU also has on its campus a preschool, A Child's Place, and an older adult program, the Renaissance Institute, to serve as additional opportunities for placement sites. Based on our enrollment projections, NDMU is confident in its ability to secure abundant Capstone sites for PPOTD students throughout Maryland.

Need for Doctorally Prepared Occupational Therapists

As PPOTD enrollees would already be licensed to practice, there is a limited amount of easily identifiable market demand (as also evidenced by Towson's lack of supporting information). The intent of a PPOTD program is twofold: 1) Prepare OTs for faculty positions; and 2) professional development to prepare OTs for leadership positions.

There are over 3,000 practicing OTs in the State of Maryland most of whom have Bachelors' or Masters' degrees. These professionals are the target candidates to enroll in NDMU's PPOTD program. Further, on a national scale, there are more than 125,000 practicing OTs most of whom have the Bachelors' or Masters' degree and would have access to NDMU's program online.

As TU's objection alludes to there is a need for additional doctorally prepared OTs to serve as faculty. **According to ACOTE, all full-time core faculty must hold a doctoral degree and "at least 50% of full-time core faculty must have a post-professional doctorate"** (ACOTE, pg. 11). ACOTE's 2027 mandate to move to a single point of entry for occupational therapy education at the doctorate level will expand this need for doctorally prepared OTDs. Thus, the need for additional post-professional programs is critical. The post-professional doctoral program proposed by Notre Dame provides another critical pathway for OTs to meet this critical need in Maryland and nationally, as well as providing necessary professional development opportunities for OT leaders.

Additionally, according to ACOTA, of 1,483 faculty positions in master's and doctoral occupational therapy programs, the current vacancy rate is 123 faculty (8%) (ACOTA, *Academic Programs Annual Data Report: Academic Year 2017-2018*).

Moreover, NDMU's **proposed OTD program contains a unique course entitled "Advanced Educational Methods in Occupational Therapy Practice & Academia" which will also serve to prepare OT practitioners to enter into academia**, further helping address any gap in the faculty workforce. The only way to prepare more faculty in the field to alleviate current or future faculty shortages is to prepare more entry level and practicing OTs at the doctoral level.

Of the states that offer occupational therapy post-professional programs (28) at the doctoral levels, the majority offer more than one option for students (AOTA). For example, Pennsylvania has eight (8) post- professional programs; Virginia has three (3). Limiting a state with a population such as Maryland's to only one institution diminishes healthy competition, options for students, innovation, and, importantly, the sharing of best practices between in-state programs.

NDMU, like TU and many other institutions, works hard to recruit, attract and retain faculty in specialized, high salary occupations, such as occupational therapy. DLLR wage information indicates that the 2017 median annual wage for an occupational therapist to be approximately \$88,000 annually. Similar challenges exist for faculty recruitment and retention in NDMU's Schools of Nursing and Pharmacy. Despite these challenges, NDMU has been successful in recruiting nationally and retaining highly accomplished and diverse faculty members in these healthcare fields.

While there are many reasons a real or perceived shortage of faculty may exist, the only solution is to increase the supply of doctorally prepared occupational therapists to meet both the demand of professional practice and education. ACOTE recognized this through its 2027 mandate to move to a single point of entry for occupational therapy education at the doctorate level. As long as Maryland continues to under-produce doctorally prepared occupational therapists, having a professionally trained pool of faculty to educate OTD students will remain a challenge. The addition of NDMU's program will be a positive step toward increasing the prospective pool of faculty in Maryland in future years.

NDMU believes Marylanders will be better served if they have the opportunity to stay in-state and pursue their education as opposed to seeking out of -state options because of limited capacity.

Conclusion

In summary, Notre Dame of Maryland University maintains that launching a new Post-professional Occupational Therapy Doctorate will have a positive impact on the State and the region by graduating doctorally prepared occupational therapists to lead the care for and educate the residents of Maryland. More importantly, such doctorally prepared OTs will be able to teach in the entry and post-professional level programs. There is no evidence that NDMU's new OTD program would cause any demonstrable harm to TU. Notre Dame will recruit faculty nationally and has already secured fieldwork sites. Neighboring states have multiple options for students, only Maryland and a few much smaller states have a sole program (AOTA, Find a Program).

NDMU also wishes to point out the University's unique faith-based mission rooted in our core School Sister of Notre Dame (SSND) inspired values of striving for intellectual and professional excellence and engaging in service to others. Our mission informs the development of all new programs and is particularly relevant to our OTD program. The professional and personal commitment of OTs is to enable their patients to resume normal physical and mental activities critical in everyday life. In short, NDMU prepares strong leaders who are well prepared and committed to addressing the needs of our local community in Baltimore and throughout the State.

We respectfully request the Commission's approval to move forward with the proposed PPOTD program. If you have any questions about our program proposal or this response, please feel free to follow up with me at (410) 532-5321 or via email at sslear@ndm.edu. We appreciate your consideration of this matter.

Sincerely,

A handwritten signature in blue ink that reads "S. Sharon Slear". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Sr. Sharon Slear, Ph.D.
Provost & Vice President of Academic Affairs

Cc: Greg FitzGerald, Chief of Staff, NDMU
Suzan Harkness, Associate Vice President of Academic Affairs, NDMU
Jennifer Frank, Vice President of Academic Affairs, MICUA
Emily Dow, Assistant Secretary of Academic Affairs, MHEC
Michael Kiphart, Director of Academic Affairs, MHEC
Karen King-Sheridan, Associate Director of Collegiate Affairs, MHEC

SS:gf