



NOTRE DAME
OF MARYLAND
UNIVERSITY

Sent via EMAIL

August 29, 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 – OTD

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 an Occupational Therapy Doctorate (OTD) program.

NDMU received notification of TU's objection from the Maryland Higher Education Commission (MHEC) on August 23, 2018. 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 our proposed OTD 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 quantitative information, our program will help fulfill a critical need for additional occupational therapists to meet the healthcare needs of Marylanders and actually work to address TU's concerns over time.

Market Demand

While not directly addressed in TU's objection, an analysis of the OTD program's labor market demand serves as compelling justification for a new program in the State of Maryland. The Department of Labor, Licensing, and Regulation (DLLR) reported that the market need for Occupational Therapists (SOC: 29-1122) will grow 21% between 2016 and 2026, with over 1,839 openings (new and replacement) during this period, or 184 openings annually in Maryland.

As referenced in TU's objection and through MHEC's 2017 Trends in Enrollment by Program report, TU's 3-year average graduating class is 76 students. This leaves an annual projected shortfall of 108 positions annually. Furthermore, TU's recent December 2017 OTD proposal indicated that their entry level production will fall from 80 admissions per year (BS/MS & MS) in AY2017-18 to 40 per year (ELOTD) in AY2019-20 worsening the shortfall (TU OTD Proposal, Page 12). Additionally, MHEC has formally recognized Occupational Therapy as a

workforce shortage area through its Workforce Shortage Student Assistance Grant Program.

On the national level, the U.S. Bureau of Labor Statistics projects 24% growth between 2016 and 2026, with over 13,300 annual job openings (new and replacement) for Occupational Therapists.

TU's letter references its concerns about occupational therapy programs from Virginia, Delaware, and Washington, D.C. entering the Maryland market. While recognizing that new out-of-state programs may be on the horizon in neighboring states, 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-state options because of limited capacity. NDMU's program will expand the state's current capacity to meet the educational and training needs of Marylanders in this high-demand, high-growth profession.

Demand and growth continues to be a challenge for the profession (AOTA 2011). The demand will only increase as retirement trends in the field leave a gap of trained and qualified OT professionals who may serve not only as practitioners but also faculty members. The demands for OT professionals continues to be strong and growing as leading edge baby boomers retire (leaving a gap) and healthcare needs increase.

Field Work Sites

Field work sites are a challenge for every college and university that offers programs that require clinicals, practicums, internships, or other required experiential learning components. While TU perceives NDMU entering the market as an additional challenge to identifying field work sites, NDMU sees an opportunity for partnership and collaboration. In order to increase the number of potential field work sites, Maryland must produce more occupational therapists to in turn serve as potential site supervisors/student mentors. Colleges and universities must also work collectively with hospitals and other healthcare facilities to create and maintain field education programs comparable to those in other healthcare fields.

NDMU through its Schools of Nursing, Pharmacy, and Education has extensive relationships and experience in seeking, arranging, and placing its students into a variety of field work sites. For example, NDMU's School of Pharmacy has partnerships with 46 hospitals and 3 long-term care facilities in the region. Similarly, the School of Nursing has partnerships with 22 hospitals. NDMU through its School of Education also has extensive connections to special education schools throughout the region which most often have an occupational therapist on site which may offer additional placement options.

As a result of NDMU's extensive partnerships in the fields of healthcare and education, NDMU faculty and administrators report experiencing minimal difficulty in securing field work placements for our students in healthcare settings. Additionally, the upcoming AOTA standards provide significant flexibility for Level I fieldwork experiences. We anticipate that securing field work sites for OTD students throughout Maryland healthcare facilities will be achievable. Furthermore, NDMU has already secured preliminary commitments from several partners to serve as field work sites.

Faculty

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 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.

Conclusion

In summary, Notre Dame of Maryland University maintains that launching a new Occupational Therapy Doctorate will have a positive impact on the State and the region by graduating doctorally prepared occupational therapists to care for and educate the residents of Maryland. There is no evidence that NDMU's new OTD program would cause any demonstrable harm to TU. On the contrary, state-level and national market demand data suggest the need for additional doctorally prepared occupational therapists in the field, and not fewer. We respectfully request the Commission's approval to move forward with the proposed OTD 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,



Sr. Sharon Slear, Ph.D.

Interim 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
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