



October 24, 2018

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

David A. Vanko, Ph.D.
Interim Provost and Executive
Vice-President for Academic
Affairs

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Towson University
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Dear Secretary Fielder:

I am writing to register Towson University's objection to the Notre Dame of Maryland University proposal to offer an occupational therapy professional doctorate (OTD).

Code of Maryland Regulations (COMAR) 13B.02.03.27B(3)(c) forms the basis of the University's objection, that this proposal constitutes 'unreasonable program duplication which would cause demonstrable harm to another institution'.

Towson University previously objected to this program on August 22, 2018 and maintains its objections. Additionally, and specific to this proposal, it seems that the primary difference between this proposal and its earlier iteration, concerns admission requirements; in this proposal students are, at least in initial cohorts, *already licensed occupational therapists*.

Consequently, how will the program differ from that previously proposed and denied when it will be unable to maintain projected enrollments as a 'post-professional' offering only, as the numbers of currently registered occupational therapists without a doctoral degree inevitably diminishes?

Additionally, as these individuals are already licensed occupational therapists it does not address or ameliorate any workforce need for additional occupational therapists.

Towson University also maintains its previously articulated concerns, which are that if recommended the program will exacerbate the already acute dearth of available fieldwork sites and increase competition for appropriately qualified faculty beyond that which is sustainable if any institution is to maintain quality. The increasing acuteness of these challenges, that another program will certainly accelerate, could undermine enrollments in both of the university's recently approved occupational therapy pre-professional and post-professional doctorates. Towson University is also cognizant that developing programs from institutions in neighboring states will render this an even greater challenge for all.

Additionally, the university is aware and concerned that institutions are offering stipends to secure fieldwork sites; this places the university at a competitive disadvantage as it is reluctant to pass this increased cost on to the student, and for a marginal and fleeting advantage if this approach becomes a *de rigueur* requirement.



The difficulty of securing sufficient and appropriate fieldwork sites and faculty has prompted Towson University to cap, contrary to its desire, the number of students admitted to its program; loss of fieldwork sites could necessitate an even lower cap.

Evidencing this already acute challenge is that in 2012 the University invested in and established the *Institute for Well Being Occupational Therapy Center (IWB-OTC)*, specifically to help ameliorate this challenge. In 2017-18, a dearth of fieldwork sites required the University to place 100% of its Level I pediatric clinical students at the IWB-OTC, and in fall 2017 and spring 2018, the respective figures for mental health clinical fieldwork were 61% and 65%.

Also, the IWB-OTC is unable to provide physical rehabilitation Level I fieldwork placements and so the University is entirely reliant upon limited sites in local hospitals and skilled nursing facilities, including Manor Care and Genesis, and all Level II fieldwork occurs outside the IWB-OTC.

Furthermore, the Accrediting Council for Occupational Therapy (ACOTE), in addition to its requirement that licensed Occupational Therapists hold a doctoral degree, is now requiring a third field experience beyond Level I and II – the Doctoral Experiential Practicum – this compounds the difficulty of securing appropriate fieldwork sites.

In short, it is only with the aid of its own purpose built facility that the university can guarantee adequate and sufficient fieldwork sites for our students and the addition of another program could fatally undermine this already difficult task.

Concerning faculty, another program in the state increases the already intense competition for qualified faculty and prompts apprehensions that any program can ensure that all faculty are appropriately experienced and qualified; this situation is already anticipated as recently developing programs in Virginia, Delaware, and Washington D.C enter the market-place.

Also, the university points out NDMU's repetition of an error of assumption, which also occurred in the previous proposal, when it declares that 'Towson University plans to graduate only 40 students per year.' It is likely that this is a reference to the number of students admitted to Towson University's M.S. in 2017 and cited in our proposal to offer an OTD; however, the Master's program graduated seventy students in 2016-17 and Towson University's OTD programs will augment that number as we fulfill ACOTE's mandate that OTs be doctoral degree educated by 2027.



If additional information or clarification is required in considering this objection please do not hesitate to contact me or the Office of the Provost staff.

Sincerely,

A handwritten signature in blue ink that reads "DAVanko".

David A. Vanko, Ph.D.
Interim Provost and Executive Vice-President
for Academic Affairs

DAV/wf

cc: Dr. Antoinette Coleman, Associate Vice Chancellor for Academic Affairs, USM
Dr. Janet DeLany, Dean of Graduate Studies, TU
Dr. Westley Forsythe, Director of Accreditation and Compliance Services, TU
Dr. Gary Levy, Associate Provost, TU
Dr. Beth Merryman, Chair, Department of Occupational Therapy &
Occupational Science, TU
Dr. Lisa Plowfield, Dean College of Health Professions, TU
Dr. Marcie Weinstein, Associate Dean, College of Health Professions, TU