

STATE OF OUR PROGRAMS: REGULATORY PRESSURES AND MARKET REALITIES SHAPING OTA AND OT EDUCATION



Academic Leadership Councils Meeting

Anaheim, 2026

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Why This Conversation Matters Now

OTA and OT education is at an inflection point driven by **higher education economics, regulatory change and workforce shifts.**

Programs are being shaped not only by professional standards, but also by these market drivers.



Key Market Drivers

Higher education pressures

- Enrollment decline
- Accreditation “reform”
- Focus on ROI & outcomes
- Loan and loan forgiveness program changes
- Equity and access challenges



Photo by [Victoria Heath](#) on [Unsplash](#)



Key Market Drivers



Practice pressures

- Decreased Medicaid funding
- Declining Medicare reimbursement
- Stagnant salaries
- Stability of K-12 services
- Mental health coverage
- Workforce shortages
- Fieldwork challenges



Today we will address...

- What are the **trends and forces** shaping higher education?
- What are the **impacts** on OTA & OT programs?
- What does this mean for our programs and **strategy**?

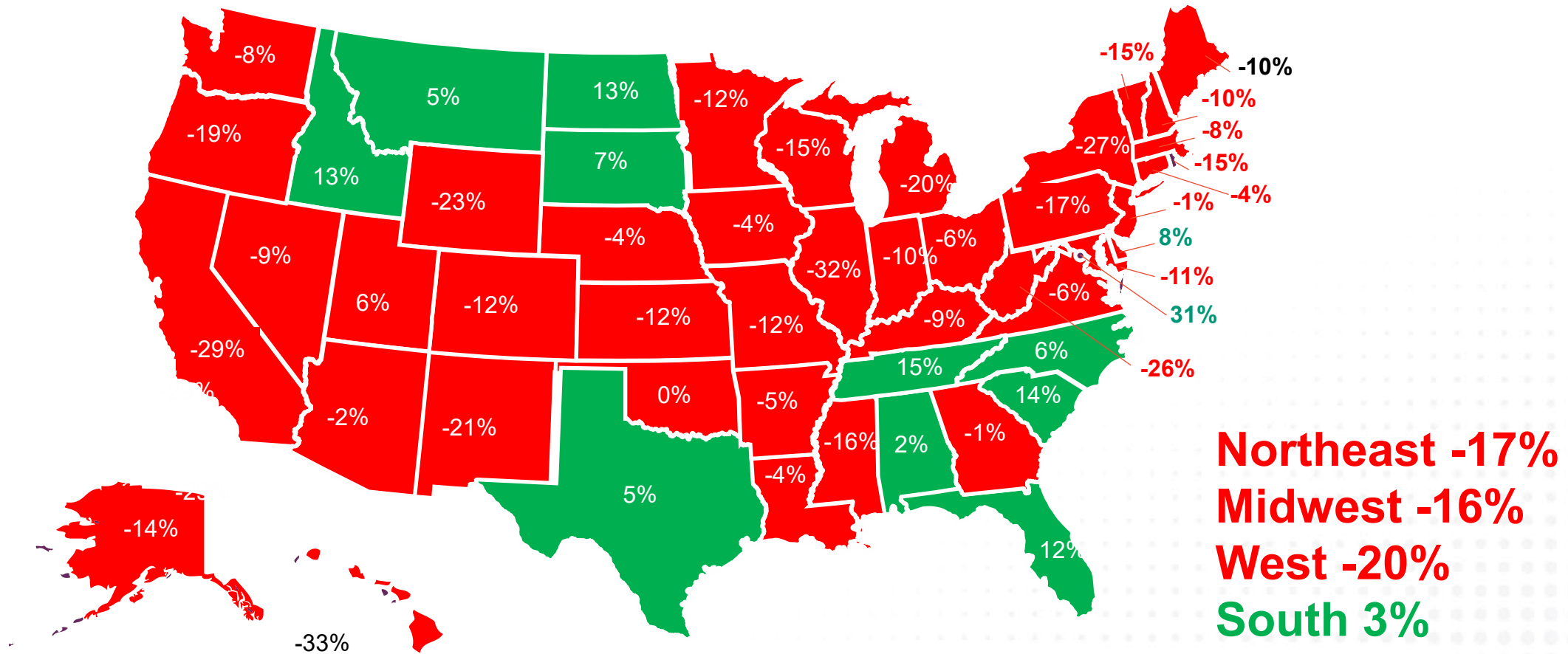


Trends and Forces Shaping Higher Education



Institutional Economics: Challenges to the Traditional Higher Education Revenue Model

-13% Projected Decline in College Enrollment 2023-2041



Source: Lane, P., Falkenstern, C., & Bransberger, P. (2024). Knocking at the College Door: Projections of High School Graduates. Western Interstate Commission for Higher Education. <https://www.wiche.edu/knocking>.



17% Decline in International Students in FY 2025

-17%

New international student enrollment declined in the fall semester of 2025.

Source: <https://www.iie.org/publications/fall-2025-snapshot-on-international-student-enrollment/>

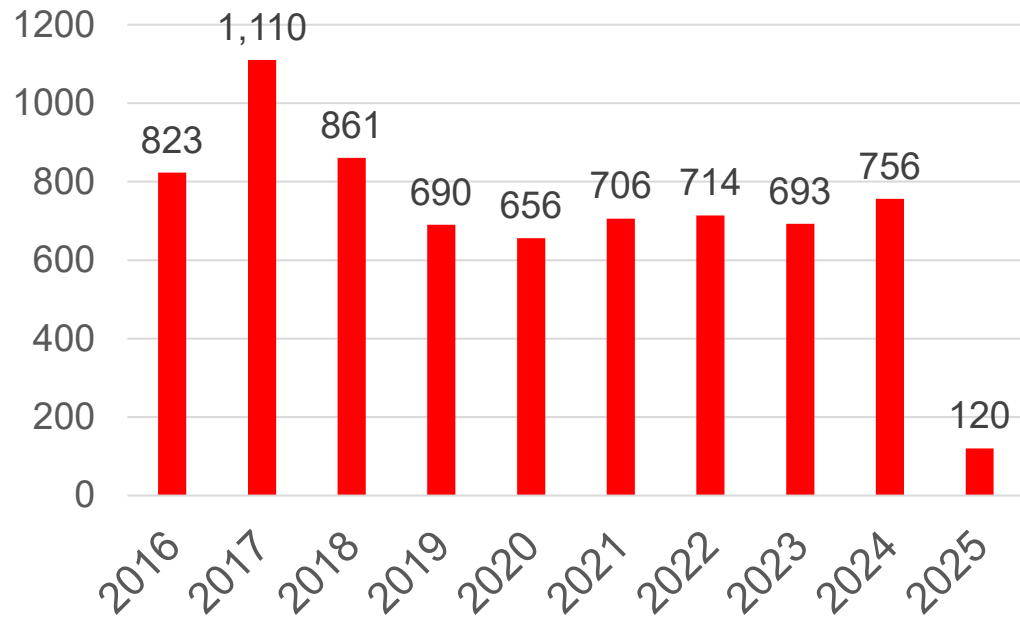
\$43

Billion

International students contributed to US economy in AY 24-25.

Source: <https://www.nafsa.org/about/about-nafsa/international-students-contributed-43-billion-us-economy-2024-2025-fall-2025>

84% Decline in NOFO's from NIH (2024 to 2025)



Source: <https://www.chronicle.com/article/why-is-the-nih-abandoning-science?sra=true>

Notifications of Funding Opportunities

2024: published 756

2025: published 120.

2026: as of March 15, published 14.

Congressional Funding to NIH:

2024: \$48.8 billion

2025: \$48.7 billion

2026: \$47.2 billion

Source: <https://www.congress.gov/crs-product/R43341#:~:text=Nearly%2082%25%20of%20the%20NIH,for%20type%201%20diabetes%20research.>



Endowments

On average, institutions participating in the **FY25 study used their endowments to fund 15.2 percent of their annual operating expenses**, up from **14 percent** in FY24 and **10.9%** in FY23

- 47.4% student financial aid
- 17.7% academic programs and research
- 10.8% endowed faculty positions
- 7.6 % operation and maintenance of facilities
- 16.6% other purposes



State Appropriations

Per-student state funding to public colleges **decreased by 1% in 2025**. The first time after twelve years of consecutive growth.

Full-time-equivalent **enrollment rose 3.6 percent** to 10.8 million in 2025. Faster than state appropriations.

Colleges' inflation-adjusted net tuition-and-fee revenue **fell by 3.5 percent in 2025**.

https://shef.sheeo.org/?utm_source=iterable&utm_medium=email&utm_campaign=campaign_17620705_nl_Daily-Briefing_date_20260409

Decline in Credit Ratings

Fitch: Higher education faces 'deteriorating' 2026 outlook

Shrinking pipeline of students, uncertainty about state and federal support, and rising expenses could all hurt college finances, according to analysts. (12/5/25)

Moody's: Higher education outlook remains negative for 2026

Enrollment, political and cost pressures abound and will stick around in the new year, analysts said in a recent report. (11/21/25)

S&P: Negative outlook for nonprofit colleges in 2026

The credit ratings agency cited federal policy shifts, rising costs and increased competition over students. (12/3/25)

Source: <https://www.highereddive.com/news/ratings-agencies-higher-ed-finance-2026-outlooks-moodys-sp-fitch-federal-policy/808596/#:~:text=Now%2C%20the%20country's%20three%20major,21%2C%202025>

Moody's 2026 Outlook

Expenses

4.4% Overall growth in **expenses** (5.2% in 2025)

Revenue

3.5% Overall growth in **revenue** (3.8% in 2025)
2.5% for small public institutions and 2.7% for small privates.

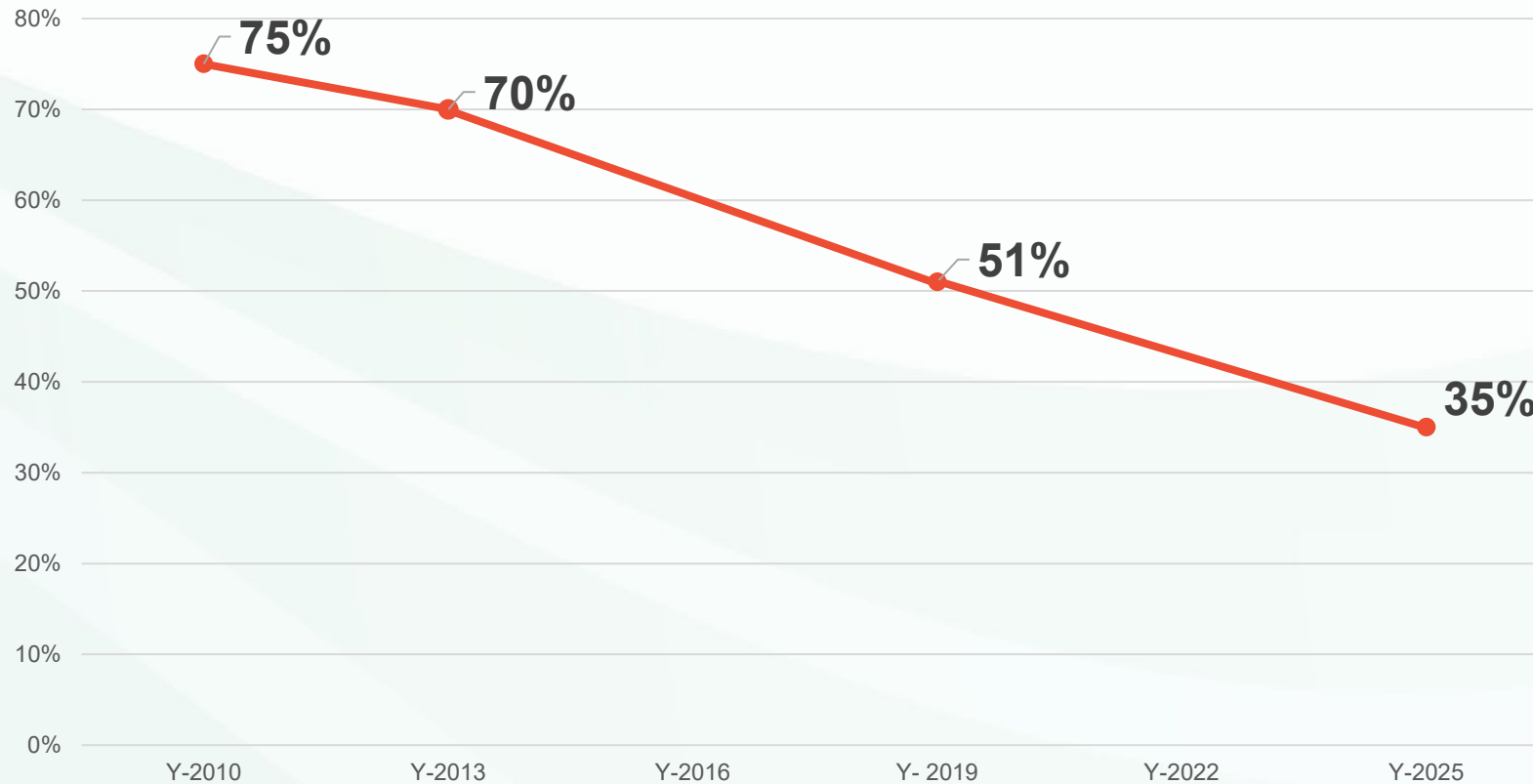
Bottom Line

16% Private colleges with **negative earnings margins**
(12.2% in 2025) (7.2% in 2024) (1,700+ Private/ Non-profit= 272)

Source: <https://www.highereddive.com/news/moodys-negative-outlook-higher-ed-2026/806097/>

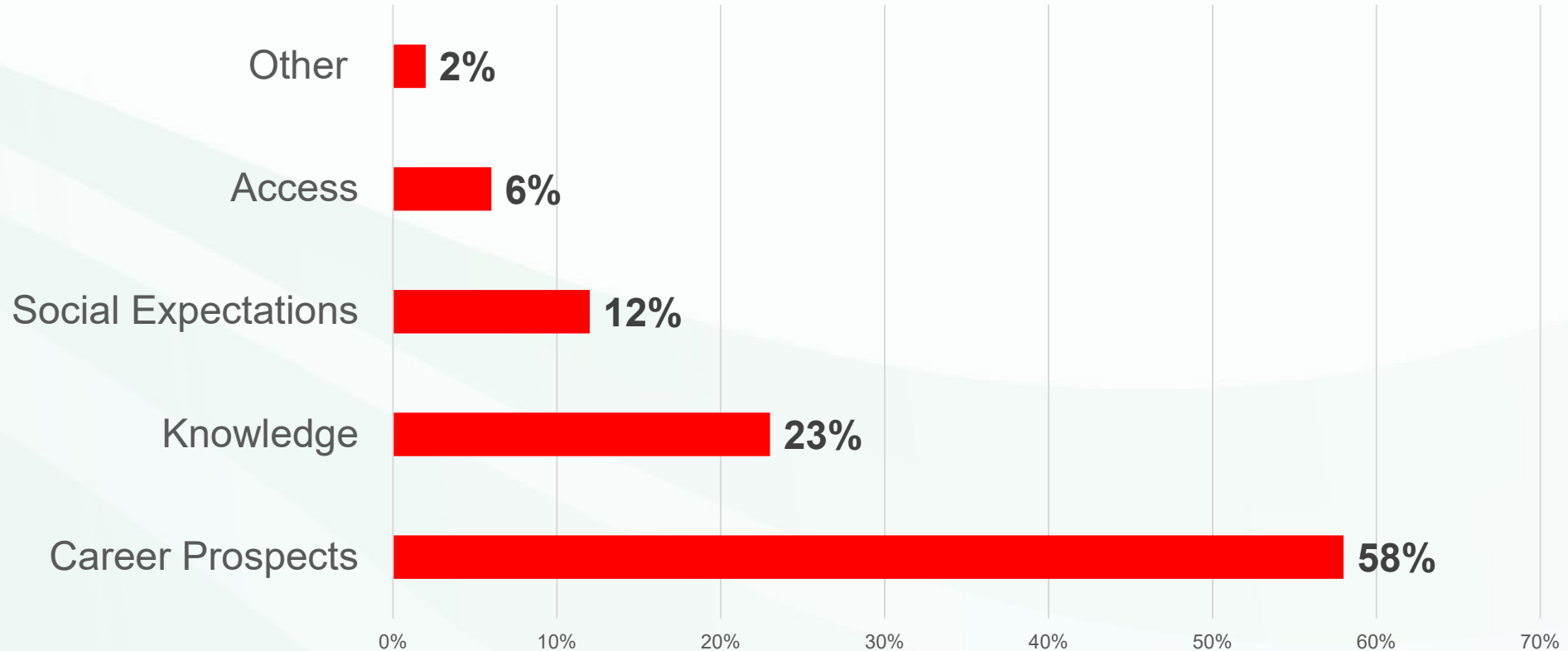
Increased Focus on the ROI and Value Proposition

% of Americans who Think College Education is “Very Important”



Source: <https://news.gallup.com/poll/695003/perceived-importance-college-hits-new-low.aspx>

Why Pursue Higher Education?



Source: <https://www.deloitte.com/us/en/insights/industry/articles-on-higher-education/2026-higher-education-trends.html>

Student Decision Factors

Students are approaching education as a financial investment.

- Program Cost (60%)
- Debt load
- Salary potential
- Career flexibility
- Program length



https://www.insidehighered.com/news/quick-takes/2025/12/04/report-cost-graduate-enrollment-gatekeeper?utm_source=chatgpt.com

Photo by [micheile henderson](#) on [Unsplash](#)



Do Higher Degree's Pay Off?

A key challenge is figuring out how to accurately measure economic return on degrees and credentials—and **deciding what to measure.**

Another challenge is that **data on economic return on degrees is not always available.** Officials for the Postsecondary Commission have said that, in many states, there isn't yet enough available data for their model to work.

Source: <https://www.peer-center.org/research/do-graduate-degrees-pay-off>

Do Higher Degree's Pay Off?

Median lifetime earnings of full-time workers by level of education:

- less than high school - \$1.2 million
- high school diploma - \$1.6 million
- some college, but no degree - \$1.9 million, equal to about \$47,500 annually
- associate's degree - \$2 million, or about \$50,000 per year
- bachelor's degree - \$2.8 million, the equivalent of \$70,000 annually
- master's degree - \$3.2 million, or \$80,000 annually
- doctoral degree - \$4 million, equal to \$100,000 per year
- professional degree - \$4.7 million, or an average of \$117,500 annually.

<https://www.forbes.com/sites/michaelnietzel/2021/10/11/new-study-college-degree-carries-big-earnings-premium-but-other-factors-matter-too/>

Benefits of a Bachelors Degree?



Photo by RUT MIIT on Unsplash

Georgetown University: McCourt School of Public Policy
Center on Education and Workforce

“Prime-age workers with a bachelor’s degree earn 70 percent more at the median than workers with a high school diploma alone and face much lower unemployment rates (2.9 percent and 6.2 percent, respectively).”

<https://cew.georgetown.edu/cew-reports/major-payoff/>

What About Graduate Degrees?

Georgetown University: McCourt School of Public Policy
Center on Education and Workforce.

Graduate-to-bachelors degree earning premium
for Healthcare - \$25,300 or 31%

<https://cew.georgetown.edu/cew-reports/major-payoff/>

The Path You Take?

But the total payoff depends strongly on:

- **Career path**
- **Cost of the degree**

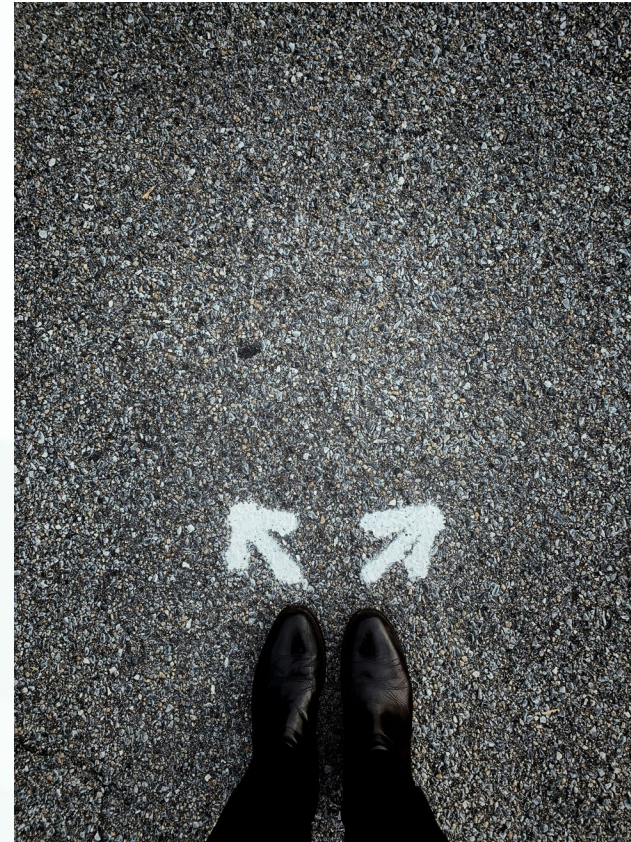
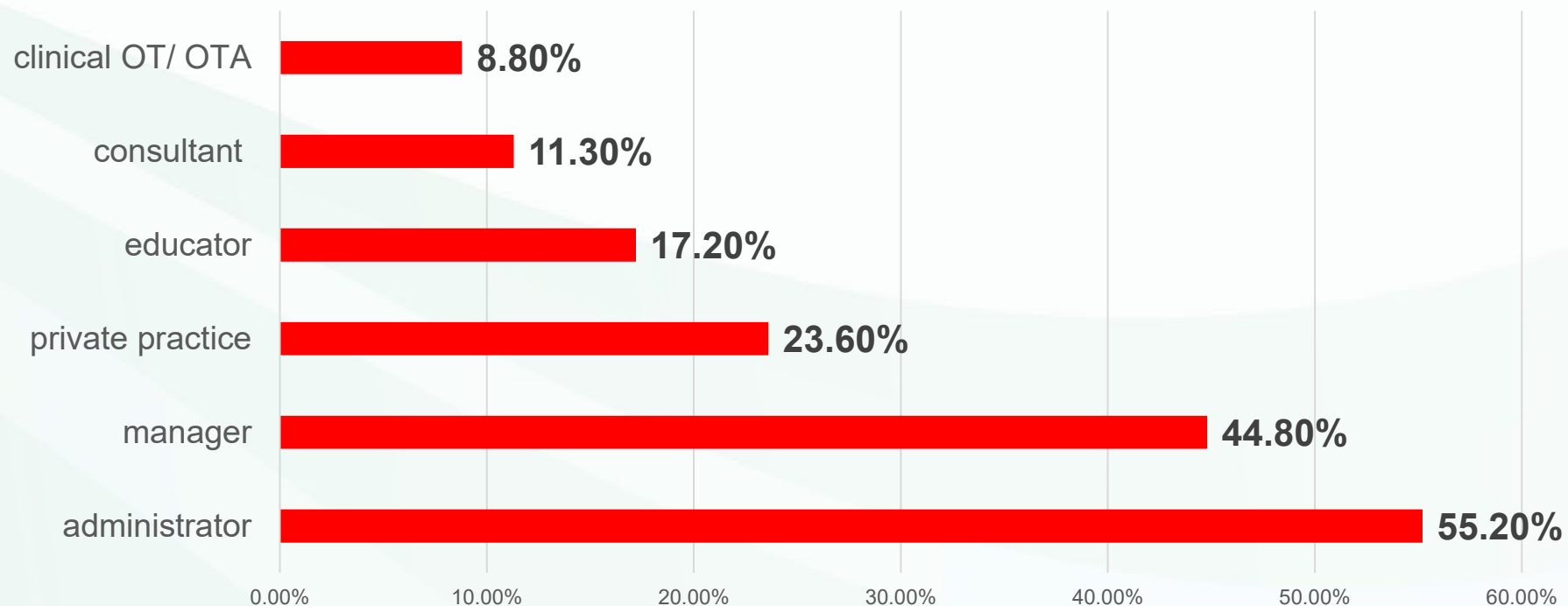


Photo by [Jon Tyson](#) on [Unsplash](#)

Career Path

Base Salary > \$100K



AOTA 2023 Workforce Survey

Cost of Attendance

Private/ Out-of-State	In-State
\$265K	
\$255K	
\$195K	
\$200K	\$150K
\$185K	\$135K
\$170K	\$145K
\$165K	
\$155K	\$115K
\$135K	\$95K
\$104K	\$65K

Source: ChatGPT: full cost of attendance @ X school. Lowest number on range.



Cuts, Mergers, Innovation and Partnerships



Program and Degree Majors Cut

Indiana axes hundreds: About 370 degree programs will be merged or consolidated under a new state law, the Indiana Commission for Higher Education announced. And 210 are suspended or eliminated.

Syracuse University nixes one-fifth: Closing or pausing 93 of 460 academic programs makes the private institution more focused, distinctive, and aligned with demand, its provost said.

Source: <https://www.chronicle.com/newsletter/daily-briefing/2026-04-07>

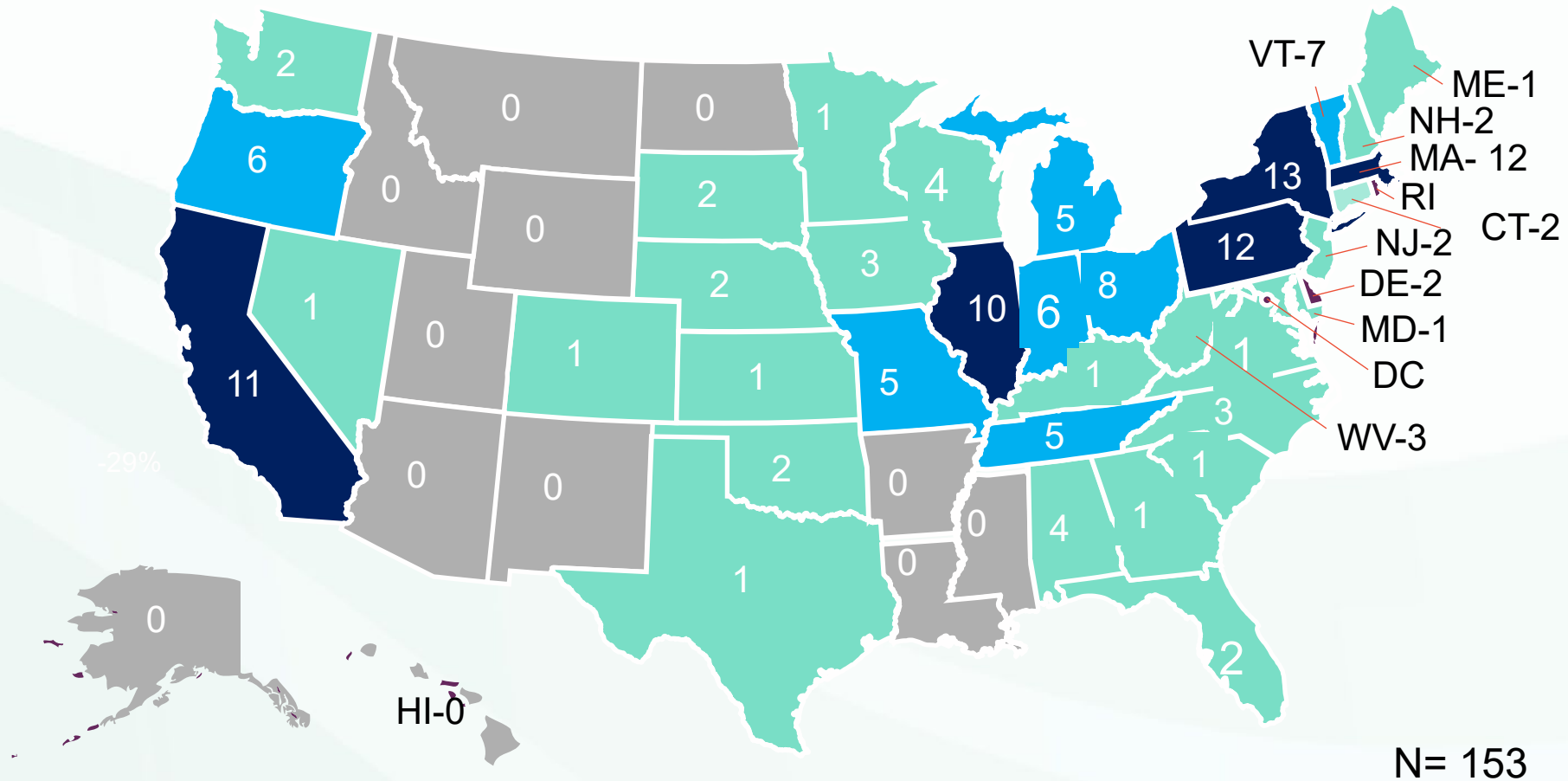
Program and Degree Majors Cut

Texas community college strikes career and technical programs: Tarrant County College trustees cited low enrollment, poor completion rates, little industry demand, and credits that don't transfer.

Oregon community colleges cut back: Lane Community College seeks to save \$4.2 million by 2027 by restructuring, eliminating jobs, and suspending two programs.

Source: <https://www.chronicle.com/newsletter/daily-briefing/2026-04-07>

Closures & Mergers by State 2016-2026



-29%

<https://www.highereddive.com/news/how-many-colleges-and-universities-have-closed-since-2016/539379/>

Closures & Mergers

2025 Survey of College and University Presidents conducted by *Inside Higher Ed* and **Hanover Research**:

Merger Likelihood: Nearly **one in five (20%)** presidents view a merger or acquisition as a likely outcome for their institution by 2030.

Serious Discussions: About **19%** of presidents reported having already engaged in serious internal discussions regarding potential mergers.

Primary Drivers: The openness to mergers is driven by a "**perfect storm**" of challenges, including the "enrollment cliff", rising operational costs, and declining public confidence in the value of a degree.

Source: <https://www.deloitte.com/us/en/insights/industry/articles-on-higher-education/2026-higher-education-trends.html>

Mergers & Health Professions

- **Russell Sage College & Albany College of Pharmacy and Health Sciences (ACPHS)** [2027]. A combined institution with a broad catalog of programs in health professions, nursing, and biomedical sciences.
- **Drexel University & Salus University** [2025]. Drexel University merged with Salus University. Most of Salus's health sciences, education, and rehabilitation programs were integrated into Drexel's College of Nursing.
- **Saint Joseph's University & Pennsylvania College of Health Sciences** [2024].: Saint Joseph's University merged with the Pennsylvania College of Health Sciences acquiring over 15 new nursing and allied health programs. In 2022, St Joseph's merged with the **University of the Sciences**, which added programs in pharmacy, physical & occupational therapy.

Innovation

Largest Universities with >100,000 Students

Western Governors University (WGU): (~185,000+ students) An **online**, competency-based university.

Southern New Hampshire University (SNHU): (~184,000+ students) A private nonprofit, known for a massive **online** presence.

Grand Canyon University (GCU): (~103,000–107,000+ students) A hybrid university with a large Phoenix campus and massive **online** enrollment.

Liberty University: (~94,000–103,000+ students) A Christian university in Virginia with a large **online** footprint.

University of Phoenix: (~101,000 students) A fully **online** institution.

Source: <https://nces.ed.gov/fastfact>



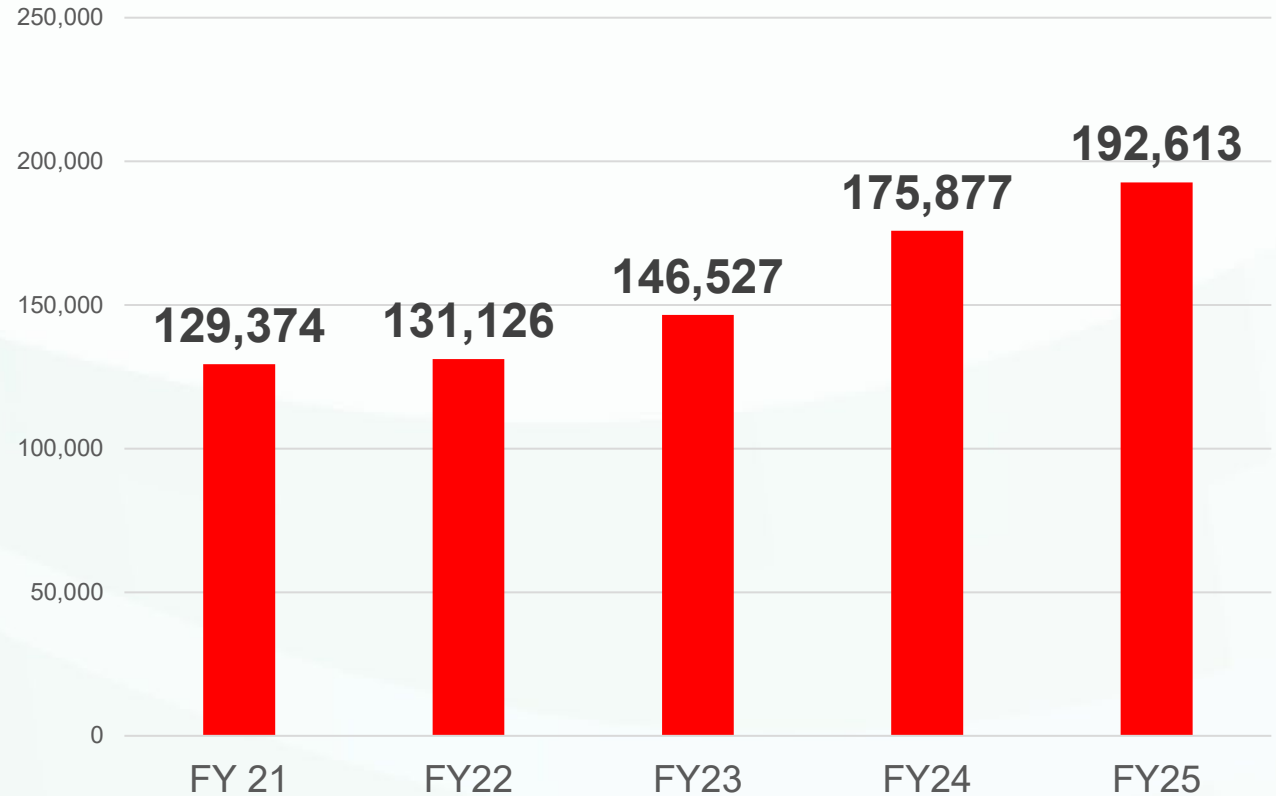
Innovation

Western Governors University

Western Governors University (WGU) is a nonprofit, fully online university founded in 1997.

It focuses on:

- Competency-based education model
- **Average time to complete a bachelor's degree with WGU is 2.5 years.**
- Just 2 years after graduation, WGU students report earning \$22,200 more per year, and \$30,300 after 4 years.



Source: https://en.wikipedia.org/wiki/Western_Governors_University. <https://www.wgu.edu/online-it-degrees/bachelors-programs.html>



Innovation

Reduced Credit Degree

Most accreditors developed pathway policies in 2024.

Policies provides guidance for institutions seeking to offer bachelor's degree programs requiring fewer than the traditional 120 semester credit hours.

Typically, **90-96 semester credit hours** and often offered in specialized or applied disciplines that prepare graduates for direct entry into the workforce.

Often eliminate elective courses while maintaining core and general education requirements.

NOT THE SAME AS ACCELERATED PATHWAYS



Degree Apprenticeships

Degree apprenticeship is an industry-vetted and approved apprenticeship program that includes the following four elements:

- 1. Paid work experience:** Apprentices earn progressive wages.
- 2. On-the-job learning:** Programs provide structured on-the-job training, including instruction from an employee mentor.
- 3. Supplemental education:** Apprentices receive classroom education, based on the skill needs of employers.
- 4. Credentials:** Apprentices earn a portable, industry-recognized credential plus an **associate, bachelor's, or master's degree.**

newamerica.org/education-policy/reports/mapping-the-landscape-of-degree-apprenticeship-expanding-a-promising-model-for-mobility/

A Recent Report from the New America noted...

“There Are Promising Opportunities for Growth in Some Occupational Categories for Which We Identified Few or No Degree Apprenticeships.....

Several occupations requiring a degree for entry with strong projected growth and above-median pay still have few to no degree apprenticeships, despite being designated as apprenticeable occupations. **Occupational therapy assistant** and physical therapy assistant require an associate degree and extensive supervised clinical experience that could be delivered through a Registered Apprenticeship, yet we located no degree apprenticeships for either occupation.”

ApprenticeshipUSA (USDOL Office of Apprenticeship), “Explore Approved Occupations for Registered Apprenticeship,” <https://www.apprenticeship.gov/apprenticeshipoccupations>.

Expanding to Graduate Programs:

Posted on March 20, 2026

The College of New Jersey, in partnership with the National Center for the Apprenticeship Degree, launched the **first-ever master's-level Registered Apprenticeship for Clinical Mental Health Counseling** in the United States. This milestone reimagines graduate education by creating an apprenticeship degree pathway where aspiring counselors earn a master's degree while gaining paid, hands-on clinical experience.

<https://tcnj.edu/2026/03/20/tcnj-and-ncad-launch-nations-first-masters-level-mental-health-counseling-apprenticeship/>

Regulatory & Policy Challenges



Elimination of the Grad Plus Loans

Effective Date: The elimination applies to new loans for new borrowers starting July 1, 2026.

Borrowing Limits: New annual and aggregate caps will be introduced to replace the unlimited nature of Grad PLUS loans. Most graduate students will be capped at \$20,500 annually and \$100,000 lifetime for unsubsidized loans.

Impact on Students: Students will likely have to rely more on personal savings, assistantships, or private education loans, causing concern for those in high-cost programs.

Impact on Institutions: Likely to depress enrollment.

Source: <https://edtrust.org/rti/eliminating-grad-plus-loans-professional-degrees-harms-women-students-of-color/>

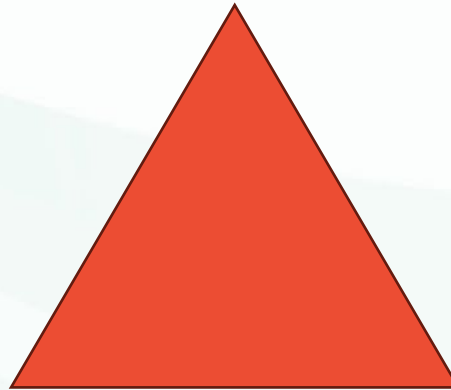
Accreditation Reform

Executive Order 14279 “Reforming Accreditation to Strengthen Higher Education.” (April 23, 2025).

- 1. Holding Accreditors Accountable:** Directs the Secretary to hold accreditation agencies responsible if they perform poorly or violate federal civil rights laws.
- 2. Refocusing Evaluation Criteria:** Accreditors to focus less on diversity, equity, and inclusion (DEI) practices and more on student success outcomes like graduation rates and return on investment — without using race, ethnicity, or sex as metrics.
- 3. Promoting Competition and Transparency:** Recognition of new accrediting agencies to foster competition. Streamline and simplify the accreditation recognition process.
- 4. Emphasizing “Intellectual Diversity”** among faculty and within institutions as a priority for accreditation standards.

Accreditation Reform

U.S. Department of Education
(Title IV : but must have authorization
& recognized Title IV accreditation)



State Authorization
(Consumer protection)

Accrediting Agency Approval
(Title IV) (academic quality)

Accreditation Reform

LAW: Higher Education Act (last reauthorized in 2008 by Congress).

REGULATIONS: Department of Education through Negotiated Rule Making

IMPLEMENTATION: Through the Department or proxies e.g. accreditors/ States

2026 Negotiated Rule Making on Accreditation: Accreditation, Innovation, and Modernization (AIM) Committee.

The U.S. Department of Education (ED) launched a negotiated rulemaking process — a formal regulatory development procedure in which federal officials and a diverse group of communities of interest (including institutional leaders, accreditors, students, veterans' groups, legal advocates, and state officials) work together to draft proposed new regulations relating to accreditation.

Accreditation Reform

AIM Committee's major areas of focus include:

Deregulation & competition

- Simplify recognition of new and existing accreditors.
- Reduce unnecessary or duplicative regulatory requirements
- Reducing duplication between: Federal requirements/
Accreditors/ States

Accreditation Reform

Institutional eligibility & gatekeeping role

- Promote transparency and accountability in how quality assurance is carried out
- Re-visit who is eligible for Total IV
- Reexamining accreditors as “gatekeepers” for:
 - Federal student aid (Title IV)

Accreditation Reform

Student Outcomes

- Amend accreditation regulations to emphasize data-driven student outcome measures rather than subjective or ideology-based criteria.
- Linking accreditation more directly to:
 - Student debt outcomes
 - Program value
 - Job placement / earnings
 - Gainful employment rules
 - Debt-to-earnings metrics

Accreditation Reform

Relationship with Trade Groups

- Address “credential-inflation” by forbidding collusion between accrediting agencies and any related, associated, or affiliated trade association or membership organization;
- Modified to allow the Department to view as a negative factor anticompetitive behavior including actions that limit entry into a profession. Ensure that accreditors are not allowed to engage in anticompetitive behavior;

Accreditation Reform

Ensure accrediting standards comply with federal civil-rights laws

- Eliminate or revise standards or policies that could be discriminatory based on immutable characteristics.
- Ensuring accreditors enforce:
 - Title VI, Title IX, ADA compliance
 - Clarifying accreditors' role in monitoring discrimination and access
- Expand current regulations on faculty standards to include support for and appropriate prioritization of intellectual diversity amongst faculty in order to advance academic freedom, intellectual inquiry...

Accreditation Reform

Accreditation Integrity

- Discourage identification of agencies as having regional scope
- Strengthen the fiscal and administrative requirements for an agency to demonstrate that it is “separate and independent” from any related, associated, or affiliated trade association or membership organization;
- require that representatives of the public on an agency board are not current or former suppliers of higher education services or professionals in the field in which the agency conducts accreditation.

Accreditation Reform

Costs

- Provide relief for students and taxpayers who have suffered from increasing tuition by allowing greater institutional flexibility to control costs and to make cost efficiency a factor that accreditors consider;
- 602.15(a)(3) added to require training of agency staff to encourage low-cost models that can provide high quality education.

Not everyone is waiting for new regulations...

- Education Under Secretary Nicholas Kent sent letters to the **Middle States Commission on Higher Education** and the **Commission on Accreditation in Physical Therapy Education** alleging that diversity, equity and inclusion practices in their standards conflict with federal law.
- – March 18, 2026

Retrieved: <https://www.insidehighered.com/news/governance/accreditation/2026/03/18/kent-warns-accreditors-over-dei>

Not everyone is waiting for new regulations...

- While both have suspended enforcement of their DEI standards, the administration is pushing the two accreditors to abolish such practices altogether. Kent indicated neither are currently noncompliant, but he noted in both letters that he was concerned about noncompliance since neither has **“formally rescinded any and all agency standards that violate federal law.”** – March 18, 2026

Retrieved: <https://www.insidehighered.com/news/governance/accreditation/2026/03/18/kent-warns-accreditors-over-dei>

Not everyone is waiting for new regulations...

The National Advisory Committee on Institutional Quality and Integrity **voted against renewing recognition of the Council on Naturopathic Medical Education** at its March meeting.

NACIQI voted to reject the renewal bid, citing concerns about **student outcomes**. While CNME's standards call for a 70 percent pass rate on the Naturopathic Physicians Licensing Examinations, several schools fall below that threshold. -March 25, 2026

Source: <https://www.insidehighered.com/news/governance/accreditation/2026/04/01/naturopathic-medicine-college-programs-face-uncertain#:~:text=The%20most%20recent%20precedent%20for,2022%2C%20under%20the%20Biden%20administration.>

Market Drivers



Occupational Therapists

- #6 in Best Health Care Jobs
- #11 in Best STEM jobs
- #20 Best Jobs (overall)
- 12% growth rate
- “high demand and strong pay”

Occupational Therapy Assistants

- #6 in Best Health Care Support Jobs
- #100 Best Jobs (overall)
- “high demand, strong growth, solid work-life balance, and good upward mobility”

Both OTA & OT are considered a “top-tier career”.

Growth in Practitioners over the Last Decade

35%

Growth in OTA practitioner
numbers 50,000 +

24%

Growth in OT practitioner
numbers ...135,000 +

<https://www.bls.gov/ooh/healthcare/occupational-therapists.htm>

<https://www.bls.gov/ooh/healthcare/occupational-therapy-assistants-and-aides.htm>

Projected Growth 2024- 2034

18%

OTA Practitioners....7,000+
openings a year

14%

OT Practitioners.... 10,000+
openings a year

Source: <https://www.bls.gov/ooh/healthcare/occupational-therapists.htm>

Source: <https://www.bls.gov/ooh/healthcare/occupational-therapy-assistants-and-aides.htm>

Key Drivers of OTA / OT Growth

- Aging population
- Chronic conditions management
- Pediatric and school systems
- Technology advancements and the human interface
- Health policy change - **shift toward proactive wellness and injury prevention**, rather than just reactive care.
- Health system changes

Source: <https://www.bls.gov/ooh/healthcare/occupational-therapists.htm>

Source: <https://www.bls.gov/ooh/healthcare/occupational-therapy-assistants-and-aides.htm>

Employer Expectations

Very limited research in this area but focus groups have identified the following themes:

- Practice-ready
- Interprofessional collaborators
- Comfortable with technology
- Adaptable to evolving care models

Employer Innovation

The physician technologist has arrived.....

“We talk about physician scientists, but now I think we need to talk about **physician technologists**, who have that interest and that we consolidate together into what I call the **AI center**,” said Dr. Hayek, vice president, chief transformation officer, and interim chair of internal medicine at The University of Texas Medical Branch in Galveston.



Photo by [Steve Johnson](#) on [Unsplash](#)

Source: https://www.beckershospitalreview.com/healthcare-information-technology/the-physician-technologist-has-arrived/?oly_enc_id=8529F4515489I2M

Underserved Populations

Disparities in access driven by geography, cost, workforce shortages, and systemic inequities.

- Rural communities
- Low-income individuals
- Racial/ethnic minorities
- Mental health populations
- Older adults
- People with disabilities

Underserved Populations

Rural Americans face unique healthcare challenges related to low population density, **aging populations**, long distances between patients and providers, and the corresponding low number of available healthcare providers.

An analysis of 2021 Medicare Part B claims shows that **46% of all occupational therapy services provided in rural and medically underserved areas are provided by OTAs**, compared to 34% in all other geographic areas.

Dobson|DaVanzo Health Economics Consulting report: "Impact on Medicare Spending of the Stabilizing Medicare Access to Rehabilitation and Therapy Act – Appendix – Detailed Data" analysis of Medicare Carrier and Outpatient Research Identifiable Files for 2021 5 <https://www.aota.org/-/media/corporate/files/advocacy/federal/otaworkforceinsnfsfinalreport922.pdf>

Summarizing the Trends...



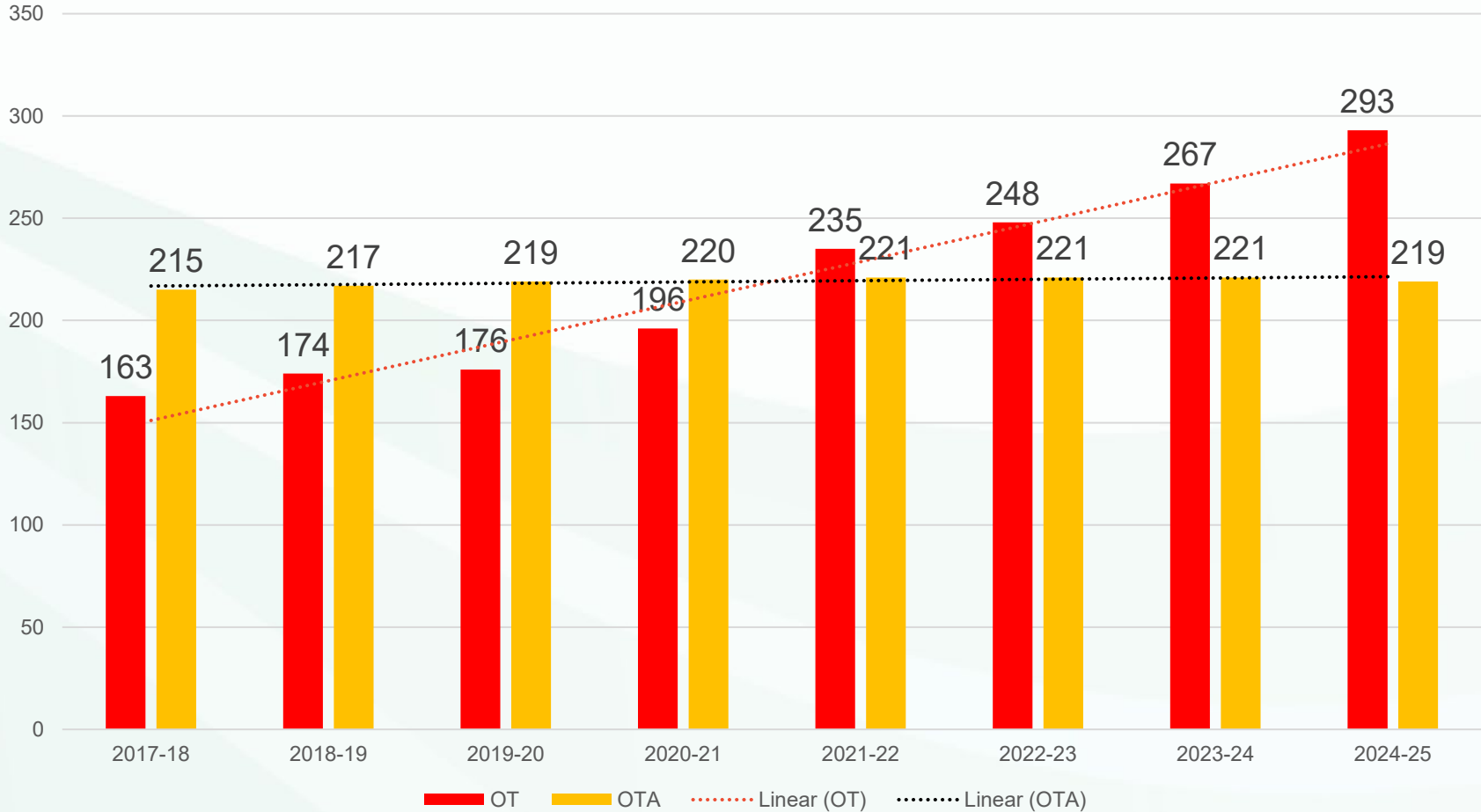


Impacts on OTA & OT programs.

Program Growth



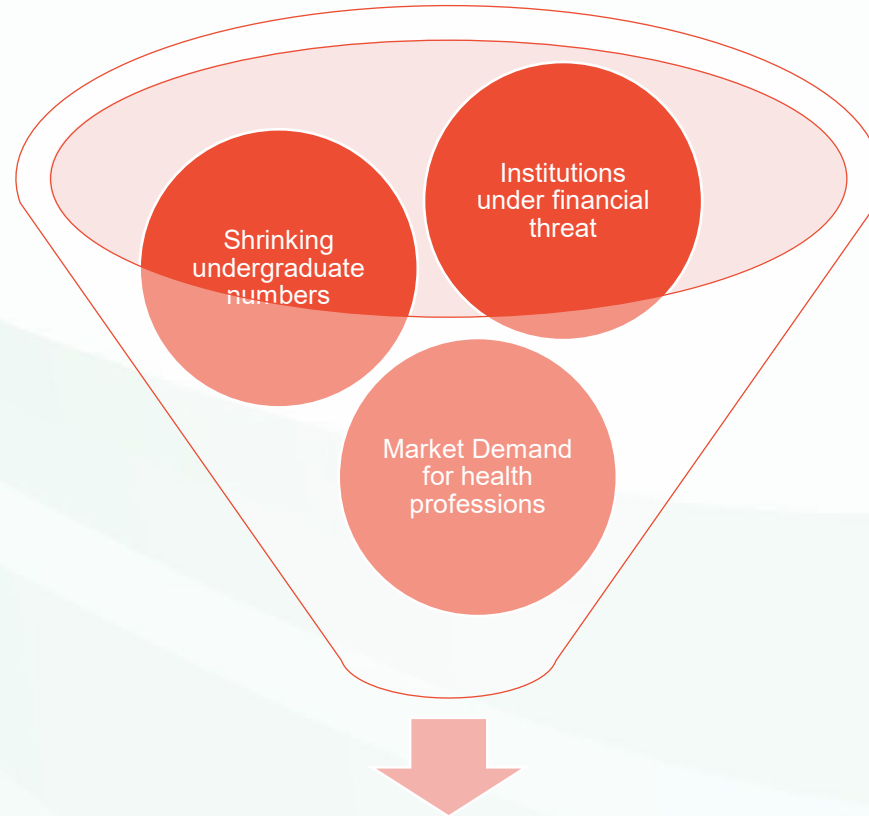
Program Growth



Source: www.acoteonline.org



Drivers of Program Growth in OT



Increase Graduate Level Programs in Health Professions

Typical Profile of Institutions Under Threat



Photo by [Philippe Bout](#) on [Unsplash](#)

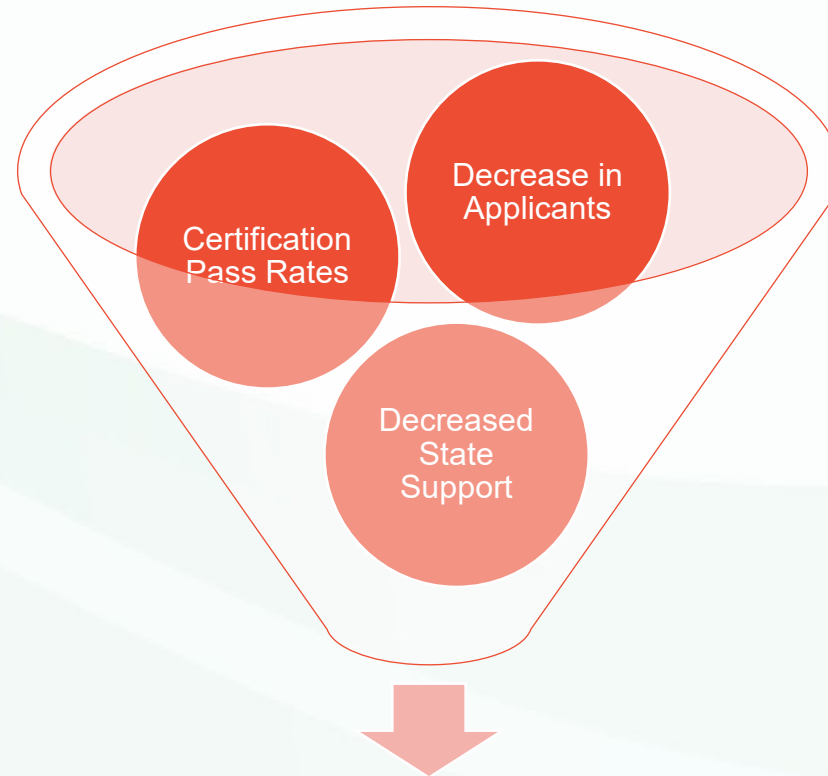
- Small private colleges (< 5,000)
- Primarily undergraduates
- Rural campuses
- Tuition-dependent institutions
- Schools with small endowments

Program Status	OTD	OTM
Accredited	154	157
Candidate or Preaccreditation	41	19
Applicant	31	11
Total	226	187

Of the total Accredited programs, 1 OTD and 5 OTM programs have Accreditation-Inactive status.
 Source: www.acoteonline.org

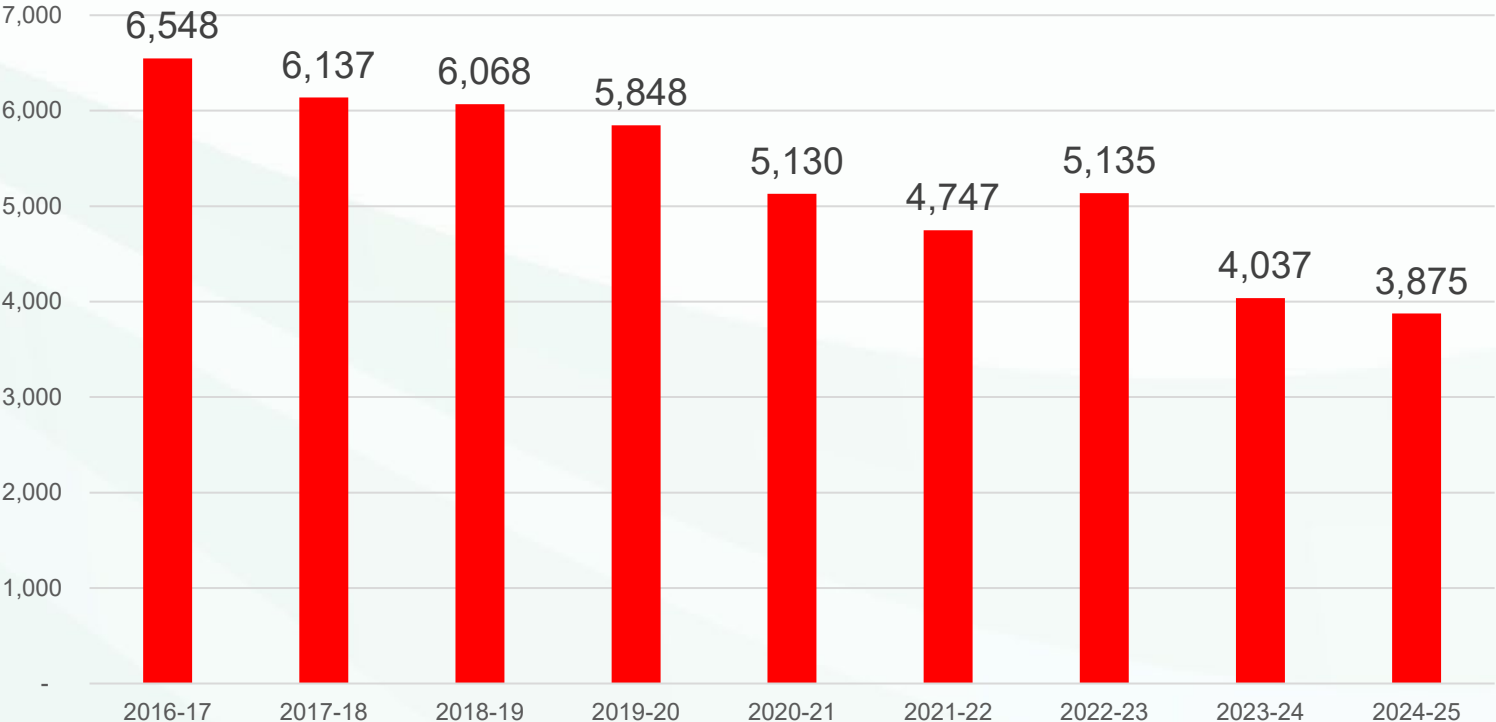


Drivers of Stagnant Growth in OTA Programs



10 Programs currently inactive – 5
are on probation for pass rates.

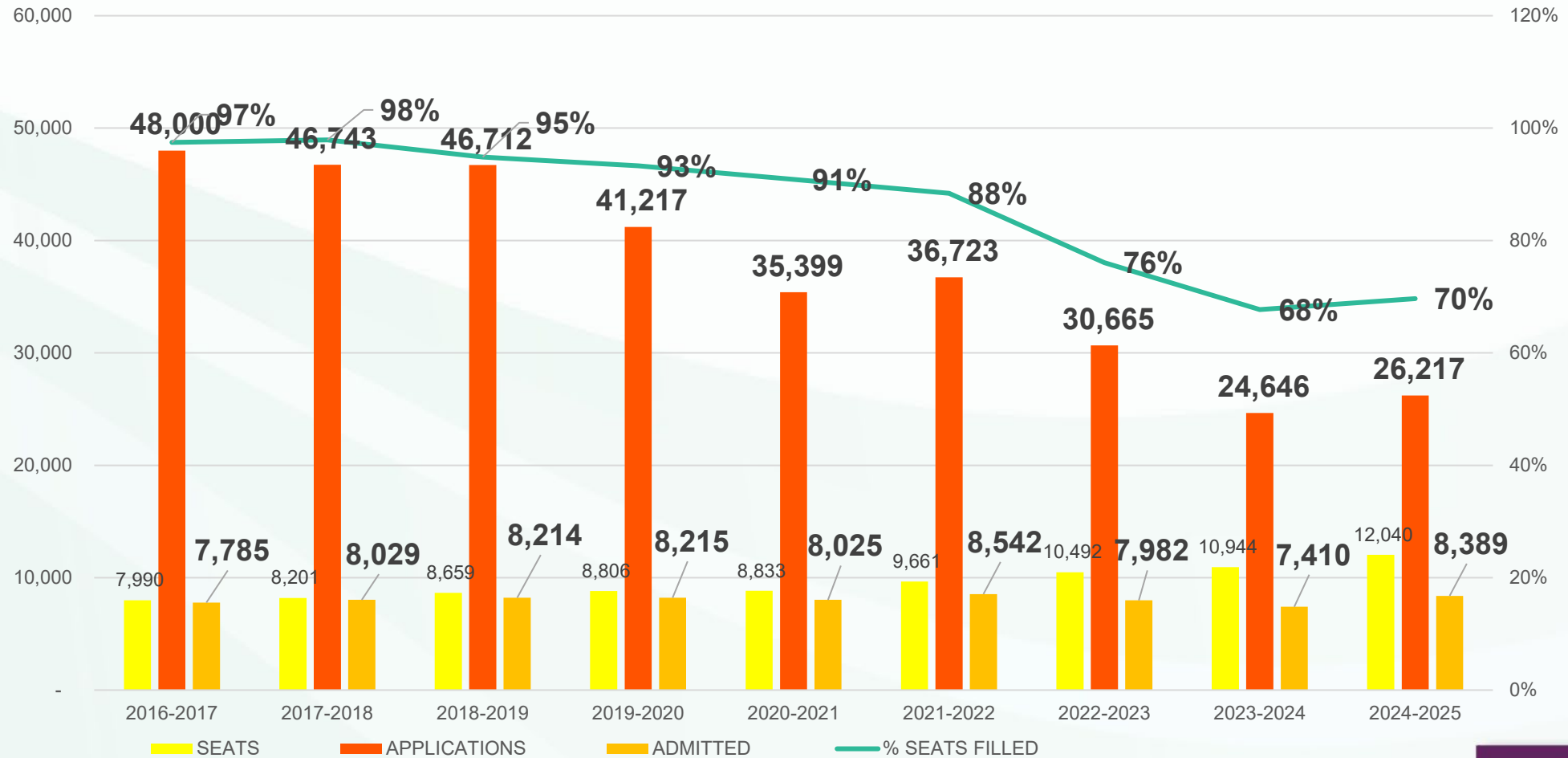
Students Admitted- OTA



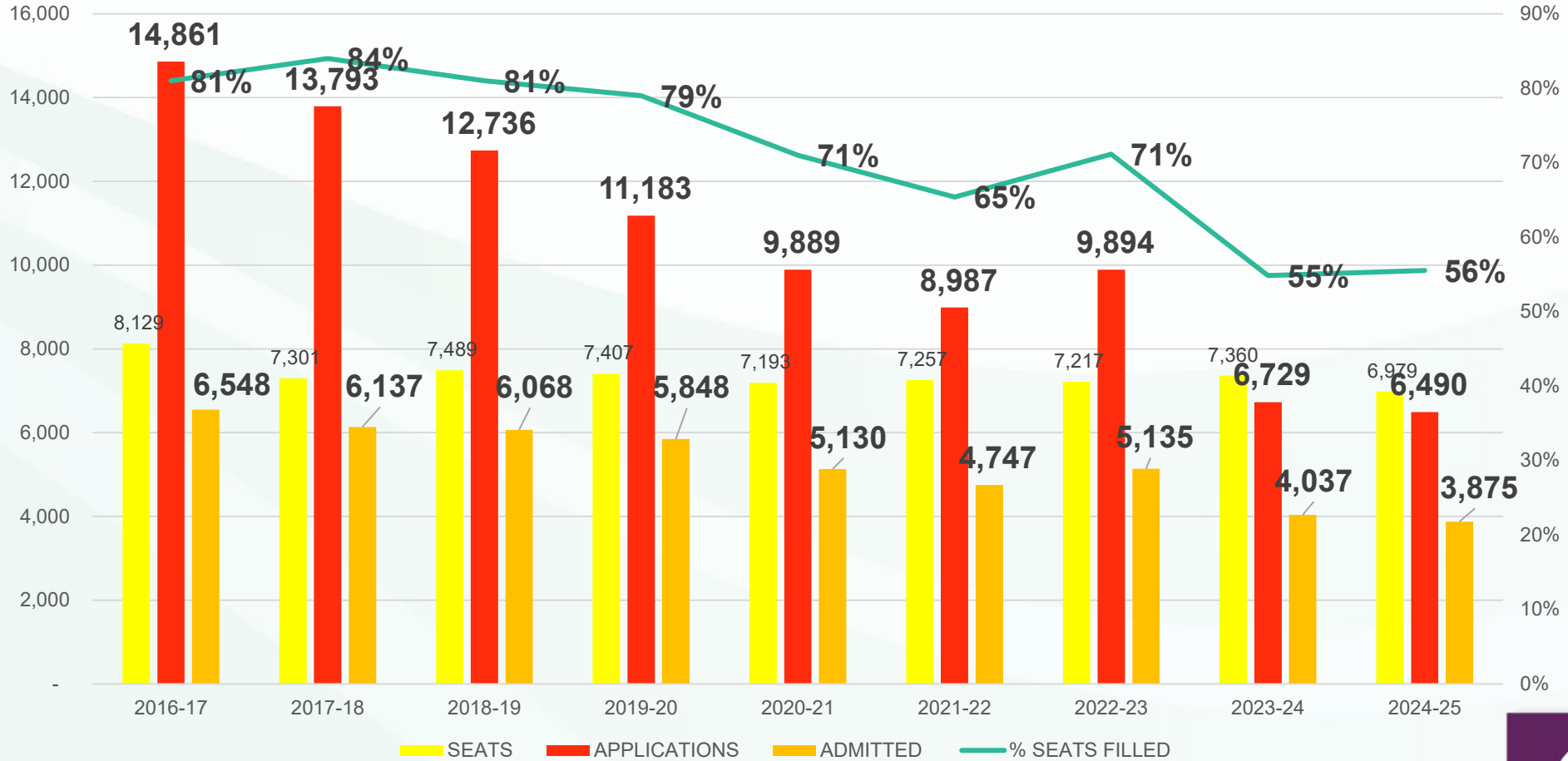
Program Economic Challenges



Applications- OT Programs



Applications- OTA Programs



Financial Sustainability

Income:

- **Tuition revenue**
- University support
- Grant/ Research
- Practice revenue

Expenses:

- **Faculty salaries**
- Labs
- Administration costs/
Fieldwork
- Supplies

Institutional Expectations

Takeaways from a Chronical Survey (March, 2026)

Pushing student success, as measured by **high retention and graduation rates**.

“Our university has an ,” one assistant professor at a large public research university told *The Chronicle*, “so there is huge pressure to push through students. We are tracked on our rates of ‘D, F, and withdrawal’ and that comes up in my annual reviews.”

Some 60 percent of the nearly 100 faculty members who responded to a survey said they had lowered their expectations because students were coming in less academically prepared. One-third said if they graded more strictly, their student course evaluations would go down.

Course: https://www.chronicle.com/article/the-real-problem-behind-grade-inflation?utm_source=Iterable&utm_medium=email&utm_campaign=campaign_17557871_nl_Daily-Briefing_date_20260406

Fieldwork Challenges

- Fieldwork capacity is a **growing constraint**.
- Factors:
 - Healthcare staffing shortages
 - Burnout
 - Administrative burden
 - Competition across programs

Impact of Financial Aid Changes

The Chronicle review found six main critiques of the elimination of the Grad Plus Loans and new proposed caps:

52 percent: The health-care work force will suffer

38 percent: Professional degrees are defined too narrowly:

38 percent: Underserved communities will be harmed

33 percent: Access to graduate programs will fall

17 percent: Loan caps are too low

12 percent: Private loans will become students' only option:

<https://www.chronicle.com/article/hundreds-of-colleges-and-professors-implore-ed-dept-to-reverse-dangerous-changes-for-grad-students>

• TheUpshot

What the New Loan Caps Will Mean for Grad Students This Fall

With new limits on federal lending, many students will need private loans and some could be shut out. See the data, program by program.

https://www.nytimes.com/2026/04/15/upshot/student-debt-graduate-school.html?unlocked_article_code=1.bVA.aSjm.faYLQZIF1kyL&smid=url-share

Top programs exceeding \$20,500 annual limit

Nurse anesthetist (doctoral)

\$46,100 per year \$25,600 over limit



Physician assistant (master's)

\$45,000 \$24,500



Nurse anesthetist (master's)

\$38,200 \$17,700



Physical therapist (doctoral)

\$37,700 \$17,200



Occupational therapist (doctoral)

\$37,400 \$16,900



Note: Amounts show average annual borrowing for borrowers who attended programs between 2020 and 2023. - Source: Department of Education.

That means aspiring physician assistants may have to find an average of \$24,500 in private loans starting this summer, and some may not be able to secure those loans at all.

Tracking the impact of these changes...



"C:\Users\nharvison\Desktop\QR Code for Loan Caps Form.png"

Innovation at Program Level



Program Delivery Innovations

- Hybrid curriculum models
- Reduced credit load degree
- Accelerated pathways
- Use of simulation
- Multiple degree pathways

The Issue Is . . .



A Call to Shift to Competency-Based Education

Hamed, R., Banks, T. M., Mahoney, D., Simon, P., Timmerberg, J. F., & Nilsen, D. M. (2023). The Issue Is—A call to shift to competency-based education. *American Journal of Occupational Therapy*, 77, 7706347010. <https://doi.org/10.5014/ajot.2023.050402>



AOTA CBE Task Force

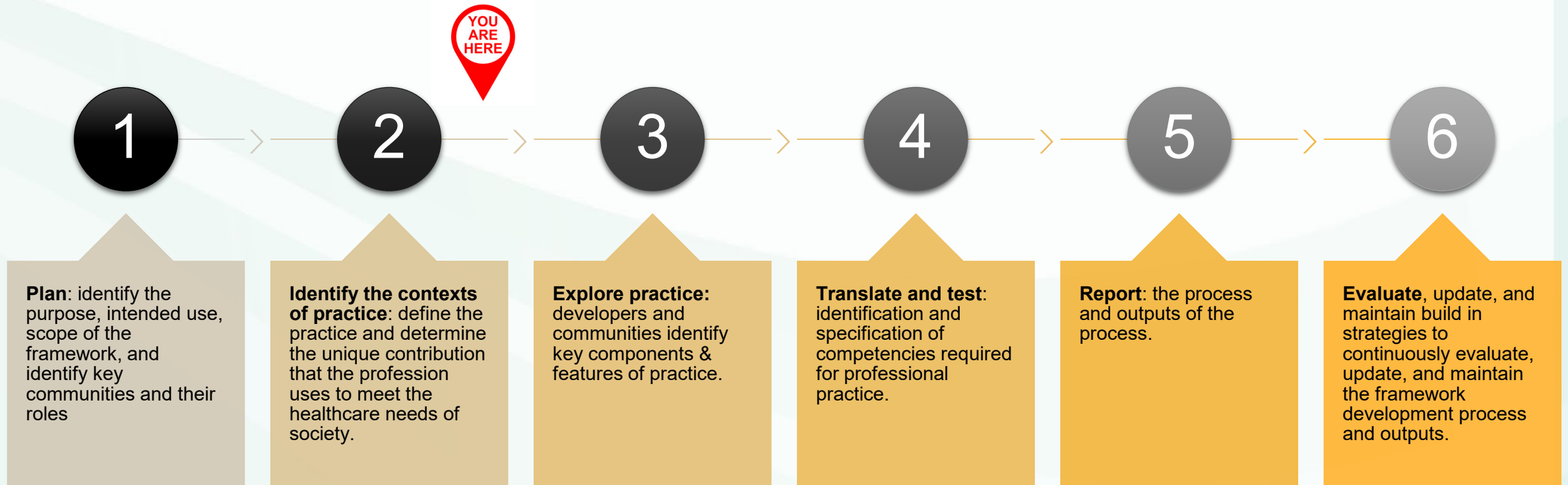
Spring 2023 RA accepted a report & recommendation from the COE to explore a CBE approach to identify core competencies and decrease excessive standards

Fall 2023 RA CBE Task Group formed & charged with exploring a CBE approach; report of findings & recommendations submitted to RA in January 2024

Spring 2024 RA accepted recommendations of the task force to develop entry-level competencies for the OT/OTA

Fall 2024 RA Competency Based Education Oversight Task Group formed charged with developing entry-level competency framework

A six-step model for developing competency frameworks (Batt et al, 2021)



Batt, A., Williams, B., Rich, J., & Tavares, W. (2021). A six-step model for developing competency frameworks in the healthcare professions. *Frontiers in Medicine*, 8, 789828.

Developing the Domains of Competency (DoC) for the OTA & OT

OTA & OT Sub-Committees

- included professionals with diverse backgrounds in geographical location, clinical practice areas, and professional level.
- educated on competency frameworks and available resources
- divided into dyads and worked independently to draft DoC
- original dyad work presented to subcommittee members for dialogue
- Utilized AI to identify common themes with member checking
- Utilized AI to generate a time-effective, systematic, non-influenced merged analysis of common areas from the two subcommittees and identify areas of non-congruence or outliers

Knox, S., Bridges, P., Chesbro, S., Gleeson, P. B., Norris, T., Rowe, R. H., & Fitzpatrick, J. (2026). Development of domains of competence and core entrance-to-practice competencies for physical therapy: A national consensus approach. *Journal of Physical Therapy Education*, 10-1097.

Develop the DoC for the Profession

Iterative process to ensure the DoC define the essence of the occupational therapy profession.

- Draft DoC documents include a title and definition with approximately six competency domains.
- Revised and approved through a Delphi process
 - Survey adapted from Knox et al. 2026
 - Subcommittee members surveyed and revisions made until consensus/agreement on DoC with 90% cut off score as acceptable for agreement

Next steps (August 2026)

- Larger reactor panel (250 members from across the profession)
- Reactor panel will further revise the DoCs through a Delphi process.
- Post for public comment

Recruitment and Pipeline Strategies

- Early exposure to OT careers
- Articulation agreements and partnerships
- Community college pathways
- Second-career students
- Holistic applications

OTCAS- Holistic Admissions

Wednesday, April 22, 2026 ~ 12:00pm-1:15pm

In-person: Hilton Anaheim Hotel ~ *Laguana AB*

Liaison's WebAdMIT Holistic and Predictive solutions:

- Holistic rubric developed specifically for occupational therapy programs, demonstrating how rubric-based scores can be generated from WebAdMIT data and applied directly to applicant records to support more consistent evaluation beyond academics.

Risks, Opportunities & Strategies

Key Takeaways



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1. OT and OTA education is being shaped by three intersecting forces:
 - **Regulation changes**
 - **Market dynamics**
 - **Economics**

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1. OT and OTA education is being shaped by three intersecting forces:
 - **Regulation changes**
 - **Market dynamics**
 - **Economics**
2. Each of these forces present potential **threats and opportunities**.
3. **Strategies** to address the threats and opportunities will vary based on several factors e.g.:
 - Institutional mission
 - low-cost public; moderate cost public; high cost private.
 - Student population
 - Location
 - Competitors, reputation etc.

Scenarios



Regulation Changes: Graduate Loan Caps

Loan
Caps

Regulation Changes: Loan Caps

Impact

Loan
Caps

Many OT
programs
not
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with caps

Regulation Changes: Loan caps

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Outcomes

Loan
Caps

Many OT
programs
not
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Pursue less costly
e.g. in-state public

OTA at Community
College

Private funds or
scholarship support

Significant private
borrowing

Take a different
career path

Regulation Changes: Loan caps

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Loan Caps

Many programs not affordable with caps

Pursue less costly in-state public

OTA Program- **potential opportunity.**

OTA at Community College

OTA - OT Part-time Bridge Programs - **opportunity**

Private funds or scholarship support

Low-cost public- **potential opportunity.**

Significant private borrowing

Mid-cost public- **potential risk**

Take a different career path

High-cost private- **potential risk**

Regulation Changes: Loan caps

	Impact	Outcomes	Threats & Opportunities	Strategies
Loan Caps	Many programs not affordable with caps	Pursue less costly in-state public	OTA Program- potential opportunity.	Marketing & recruitment Alternative delivery models to reduce costs & time of attendance Funding and loan support
		OTA at Community College	OTA - OT Part-time Bridge Programs - opportunity	
		Private funds or scholarship support	Low-cost public- potential opportunity.	
		Significant private borrowing	Mid-cost public- potential risk	
		Take a different career path	High-cost private- potential risk	

Market Trends: Decreased OTA Students

Impact

Outcomes

Threats, Opportunities

Strategies

Drop in
OTA
Students

Market Trends: Decreased OTA Students

Impact

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Drop in
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Decrease in
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Impact on aging and
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Shortages in rural
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Increased funding for rural
workforce development and
retention - **opportunity**

Innovation funding:
telehealth, remote
monitoring **opportunity**

Demonstration models on
team based primary care -
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Loss of positions to other
professions – **threat**

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Strategies

Institutional
support for
workforce
development
grants @ OTA

OT/ OTA
Partnerships

Research on
telehealth/
remote
monitoring





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