



The American
Occupational Therapy
Association, Inc.

*Occupational Therapy:
Skills for the Job of Living*

Via online submission

July 13, 2006

Anne Louise Marshall
Standard Occupational Classification Revision Policy Committee
U.S. Bureau of Labor Statistics
Suite 2135
2 Massachusetts Avenue NE
Washington, DC 20212

Dear Ms. Marshall,

The American Occupational Therapy Association (AOTA) represents over 35,000 occupational therapists, occupational therapy assistants, and students of occupational therapy. We are submitting these comments in regard to the revision of the Standard Occupational Classification (SOC). AOTA appreciates the opportunity to provide recommendations for improving the existing detailed classifications of occupational therapist and the current title of occupational therapist assistant.

The latter title is of great concern to us. It should be changed to the term used by state licensure, the profession, payers, and practitioner which is occupational therapy assistant.

AOTA recommends changing the title of classification 31-1122 Occupational Therapist Assistants and all references to that classification to Occupational Therapy Assistant. Although the profession of physical therapy uses the term “therapist assistant”, it is not used in relation to occupational therapy. Occupational therapy assistant is the term found throughout literature from AOTA, occupational therapy educational programs, state practice and licensure acts, as well as health care payers such as Medicare, Medicaid, and private insurance plans. While this may be viewed a small change, it is an important distinction for occupational therapy and will improve the accuracy of the standard occupational classification during this current revision.

In addition to the change noted above, AOTA also suggests updating the definition of occupational therapists to better define the true scope of occupational therapy. Most significantly, it should be noted that occupational therapists work with many populations and that their work can benefit people throughout the lifespan. In fact, occupational therapists work with infants, children, people with physical and mental disabilities and older Americans to improve, restore and maintain function and occupational performance. Occupational therapists and occupational therapy assistants also work in the area of prevention and can help patients modify performance to compensate for impairments and maximize function. In order to capture these aspects of practice, AOTA suggests the following definition of occupational therapist:

Occupational Therapists assess, plan, organize, and engage in therapeutic programs that help restore, improve, and maintain function and performance related to vocation, home making, daily living skills, and general independence in activities of meaning in multiple practice settings for individuals throughout the lifespan.

AOTA also recommends minor changes to the current classification 31-2011 Occupational Therapist Assistant that we believe should be changed to Occupational **Therapy** Assistant. This classification requires an associate’s degree and is licensed or otherwise regulated in all but two states. The following definition will more appropriately reflect the suggested definition of Occupational Therapist included above and more accurately describe the professional preparation necessary for the classification of occupational therapy assistants:

The American
Occupational Therapy
Association, Inc.

4720 Montgomery Lane
Bethesda, MD 20814-3425

301-652-2682
301-652-7711 Fax

800-377-8555 TDD
www.aota.org



The American
Occupational Therapy
Association, Inc.

*Occupational Therapy:
Skills for the Job of Living*

Occupational Therapy Assistants provide occupational therapy treatments and procedures in collaboration with and under the supervision of occupational therapists. May, according to State law and regulation, assist in the development of treatment plans, carry out routine functions, direct therapeutic activity programs and document progress of treatments. Requires an Associate's Degree and licensure, certification, or compliance with other regulated status in most states.

AOTA looks forward to working with the Bureau of Labor Statistics to ensure that the classifications related to occupational therapy accurately reflect the terms used in the field and the scope of practice for the profession. The SOC is the definitive resource for the definition of workforce related terms and AOTA believes the changes recommended in these comments will improve the system and provide more complete information to the public. Again, AOTA appreciates the opportunity to submit comments related to the revision of the SOC and is available for additional consultation as necessary to ensure the most accurate classification of the profession we represent as possible.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christina A. Metzler'. The signature is fluid and cursive, with the first name 'Christina' being the most prominent part.

Christina A. Metzler
Chief Public Affairs Officer