

**AOTA Response to Center for Medicare and Medicaid Services:
Implementation of the Independence at Home Demonstration Program
December 30, 2010**

The American Occupational Therapy Association (AOTA) is the national professional association representing the interests of more than 140,000 occupational therapy practitioners and students of occupational therapy throughout the United States. We appreciate the opportunity to submit these comments and recommendations regarding the Independence at Home Demonstration Program authorized by Sec. 3024 of the Affordable Care Act (P.L. 111-148). AOTA believes this program will help illustrate the effectiveness and critical role the Independence at Home Program and other new patient and provider centered approaches, when implemented correctly and incorporating all essential services, including occupational therapy, can play in helping to transform and shape the future of our health care delivery system.

AOTA believes it is critical for this demonstration program to consider primary care broadly and believes it is critical the “primary care teams”, as described in Sec. 3024 of the ACA, contain the full panoply of qualified providers including occupational therapy practitioners, to insure patient access to all services critical to their overall health. Occupational therapy practitioners are critical to providing comprehensive, coordinated, continuous, and accessible care to high-need populations at home and across all treatment settings bringing a unique skill set and expertise critical to the optimal performance of any “primary care team”.

Our members’ unique skill set supports self-management, health and participation in their healthcare in a population challenged by a variety of issues. Occupational therapy evaluates the person, their needs and their capabilities to optimize their ability for maximum health. Occupational therapy can contribute to overall effectiveness of the primary care program by helping patients with limitations in functional activities or performance necessary for their daily routines especially health maintenance such as proper medication procedures or adherence to other necessary routines; enhancing access to participation in activities such as shopping or cooking in their home or community due to environmental or other barriers. Supporting self-management facilitates individuals to function in their desired environment, often preventing higher levels of more costly care. Occupational therapy practitioners can be used in improving efficiency, implementing new administrative requirements, and maximizing outcomes for patients within the context of a “primary care team”.

AOTA urges the Secretary to coordinate with all appropriate stakeholder groups including the American Occupational Therapy Association (AOTA) to coordinate implementation and ensure the maximum efficacy and effectiveness of this important demonstration program.

We appreciate the opportunity to provide comments regarding this important issue. Please do not hesitate to contact AOTA with any additional questions or concerns.

