

Occupational Therapy in Medicare Home Health

Support the Medicare Home Health Accessibility Act (H.R.2013)

Occupational therapists (OTs) and occupational therapy assistants (OTAs) have long been recognized as critical providers of home health care services under Medicare Part A; however, occupational therapy is the only skilled service that does not *qualify a beneficiary for the Part A* home health benefit. As a result, OT services cannot be provided in a beneficiary's home unless nursing or other therapy services are simultaneously ordered at the start of care. This can result in Medicare beneficiaries not receiving occupational therapy services that would enable them to maximize their ability to thrive at home and to avoid costly rehospitalizations unless other disciplines are also ordered. For example, some beneficiaries with low vision, dementia, diabetes and COPD could receive tremendous benefit from OT services, but may not also require nursing, physical therapy or speech services when home health orders are written. The Medicare Home Health Accessibility Act (H.R.2013) was introduced by Reps. Lloyd Smucker, Lloyd Doggett, Dr. John Joyce and Paul Tonko in March 2025, and it would simply enable occupational therapy to be ordered as a stand-alone home health service for Medicare beneficiaries if and when appropriate.

Occupational therapy was added as a Part A Medicare home health qualifying benefit in 1980, but that status was changed in 1981 to non-qualifying as part of budgetary cost-saving measures. Since then, CMS has altered its Part A Medicare home health reimbursement model several times, most recently in 2020 when it implemented the Patient Driven Groupings Model (PDGM). This current payment model reimburses based on patient characteristics and not by how many services are provided. H.R.2013 would enhance this model by enabling home health services to be better tailored to each specific patient. Under current rules, occupational therapy can already establish eligibility for the Medicare home health benefit on a *continuing need basis* after other services have been discharged, and OT is the only service still needed by the beneficiary. Occupational therapy is also a stand-alone service in many states under the Medicaid home health benefit.

H.R.2013 would not have any impact on the Condition of Participation standard that nurses open a home health case if nursing is on the original order. Based on legislation enacted in 2020, the Centers for Medicare & Medicaid Services has already allowed occupational therapists to conduct the Initial and Comprehensive Assessments required to open a Medicare home health case when it is ordered with either physical therapy or speech language pathology. Occupational therapists are, therefore, already allowed to be the first service in the door to see a beneficiary. H.R.2013 would simply enable stand-alone occupational therapy services to be ordered when appropriate.

An analysis of the budgetary implications of the bill was conducted by The Moran Company, and the 10-year score was estimated to be \$223 million. This does not take into consideration potential savings to the Medicare program related to avoided hospitalizations through the provision of OT services in the home resulting in fewer falls and other incidents. Such savings have been demonstrated in acute care settings¹, and multiple studies have demonstrated that occupational therapy-led home safety evaluations paired with low-cost modifications decrease disability and result in significant cost savings^{2,3,4}.

H.R.2013 has been endorsed by AOTA, ADVION, National Alliance for Care at Home, National Association of Rehabilitation Providers and Agencies (NARA) and the National Rural Health Association (NRHA). Contact Andy Bopp, abopp@aota.org for additional information.

¹ <https://journals.sagepub.com/doi/10.1177/1077558716666981>

² <https://agsjournals.onlinelibrary.wiley.com/doi/abs/10.1111/jgs.15143>

³ <https://www.healthaffairs.org/doi/10.1377/hlthaff.2016.1305>

⁴ <https://www.healthaffairs.org/doi/10.1377/hlthaff.2016.0140>