



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Washington, DC 20415

Employee Services

MAY 4 - 2018

Ashley M. Delosh, JD
Payment Policy Specialist
American Occupational Therapy Association
4720 Montgomery Lane
Bethesda, MD 20814-3449

Dear Ms. Delosh:

Thank you for your letter to the U.S. Office of Personnel Management (OPM), requesting reconsideration or an amendment to the individual occupational requirements for the Occupational Therapy, 0631 Series.

OPM issued the updated Job Family Standard (JFS) and Qualification Standards for Professional work in the Medical and Healthcare Group in September 2017. The JFS for Professional Work in the Medical and Healthcare Group includes the Occupational Therapy, 0631 Series. Before issuing the JFS and Qualification Standards OPM consulted with Federal agencies as required by Title 5, United States Code Chapter 51. Federal Agency subject matter experts participated in the review and development of changes to the classification and qualification standards. Federal agencies and other stakeholders were afforded the opportunity to evaluate, test apply and provide comments in regards to the proposed changes and their application of the updated standards. There was no mention of any challenges or issues with applying the individual occupational requirements for the Occupational Therapy, 0631 Series by Federal agencies. Since the issuance of the JFS and Qualifications Standards OPM has worked closely with Federal agencies in the implementation of the new standards. The Federal agencies implementing the new standards have not reported issues with applying the updated Qualification Standards to hire and/or promote employees.

The updates to the Occupational Therapy, 0631 Qualification Standards does not preclude agencies from considering the qualifications of individuals with legacy degrees (i.e., Bachelor Degree). Agencies may consider past experiences as well as legacy degrees to determine the qualifications of applicants. Such applicants may demonstrate their ability to perform the work as a result of exceptional experience or a combination of education and experience. In such cases, agencies may consider additional qualification factors

This flexibility in the qualifications policy allows Federal agencies to consider individual applicants qualifications based on their education and experience. For example, an applicant for an occupational therapist position with 15 years of experience and a Bachelor's of Science Degree in Occupational Therapy could be considered qualified by a Federal agency. Without any specific examples of agencies with challenges, a reconsideration or amendment to the individual occupational requirements would be difficult to address. However, OPM will continue to work closely with Federal agencies during and after the implementation of the new qualification policy to address any issues and determine if any future revisions to the policy are needed.

Thank you for the opportunity to respond to your concerns. April Davis, Director of Classification and Assessment Policy, may be contacted to further discuss classification and qualification standards. Ms. Davis may be reached at April.Davis@opm.gov or 202-606-3600.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberly A. Holden". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Kimberly A. Holden
Deputy Associate Director
Talent Acquisition and Workforce Shaping