

June 21, 2018

April Davis
Director of Classification and Assessment Policy
Office of Personnel Management
Employee Services
1900 E Street N.W.
Washington, DC 20415

Re: Occupational Therapy Series, 0631

Dear Ms. Davis:

The American Occupational Therapy Association is the national professional association representing the interests of more than 213,000 occupational therapists, occupational therapy assistants, and students of occupational therapy. The science-driven, evidence-based practice of occupational therapy enables people of all ages to live life to its fullest by promoting participation in daily occupations or activities. In so doing, growth, development and overall functional abilities are enhanced and the effects associated with illness, injuries, and disability or minimized. This letter is submitted in response to recent correspondence sent from Kimberly Holden answering AOTA's statement of concern regarding certain limitations found within the framework of the updated Job Family Standard (JFS) and Qualification Standards for Professional work in the Medical and Healthcare Group in September 2017.

Unfortunately, despite Ms. Holden's assertion that the Federal agencies implementing the standards have not reported any issues with applying the updated Qualification Standards, we have been notified by our occupational therapy membership of issues specifically related to hiring procedures and/or the ability to promote existing employees within certain Federal agencies. Furthermore, while we appreciate the fact that Ms. Holden's letter indicated that Agencies *may* consider past experiences as well as legacy degrees (i.e., a Bachelor Degree) in addition to an applicant's ability to perform the work as a result of exceptional experience or a combination of education and experience – we do not find this policy documented anywhere in official agency guidance. Further, this has simply not been the case for a number of our members, which leads us to believe that applicants will be faced with more of an uphill battle than anticipated by OPM.

Ms. Holden noted that “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.” In the scenarios we provide below, it is not an occupational therapist assessing and performing a weighing of factors for the purposes of filling a vacancy- what is more likely the case is that it is a representative from Human Resources simply screening an application for objective credentials and educational background to determine whether an applicant is eligible on the basis of those credentials, and either referred or not referred immediately following that determination. This person is essentially the gatekeeper

to the hiring authority who likely would have been in a better position to use subjective discretion on the basis of the candidate's education *in addition to* his/her experiences. Since this individual at the threshold level of application review is mainly relying on a qualifications checklist, a candidate with a Bachelor's is not even considered regardless of experience, due to the Master's education requirement. Below are examples that illustrate how an occupational therapist was not chosen for an open position or advancement as a consequence of not meeting this educational requirement. **We urge OPM to issue a written clarification regarding the qualifications and inclusion of experience for Occupational Therapy Series 0631 to hiring managers, recruiters, etc., who may be charged with the initial stage of review for application candidates in this realm.**

Example #1

A qualified occupational therapist applied for a GS occupational therapist position at NIH. A holistic review of her application would reveal that she has 17 years of clinical experience as an occupational therapist specializing in OT evaluation and treatment of individuals with serious mental illnesses. She possesses both an active state license and NBCOT certification. She received specialty certification in the areas of Psychiatric Rehabilitation from the Psychiatric Rehabilitation Association for over 10 years in the field. In addition to possessing a Master's in Public Health, which included coursework in health research, policy, program development and evaluation, she has presented on topics related to mental health occupational therapy, and has international experience with capacity-building and rehabilitation program development in low resource settings.

This applicant was notified by NIH HR that she did not meet the basic education qualifications for this position and would not be referred to the hiring manager.

When the applicant spoke to the HR representative about the basic qualifications, she was referred to the OPM class standards for Occupational Therapy Series 0631, effective September 2017 and furthermore *was told that there was no flexibility in the standard to account for her experience, Master's degree in a related discipline, or the fact she had been already working as a contractor in the position for 4 years.*

Example #2

A qualified occupational therapist has been working as a contractor at the Department of Army (MedCom) setting for the past two years. The therapist possesses more than the desired length of experience the Federal Agency is seeking, in addition to 14 years of other prior relative work experience. However, the barrier she is facing rests solely on the educational requirement of this occupational series. This therapist has noticed that with regard to vacancies with MedCom and DHA, each of these restrict the education requirement to a "graduate degree or higher." She has not been referred by USAJOBS to any of these vacancies since December with the reason being cited that "[she] did not meet the education requirement." On the other hand, she has been referred for every VA job she applied to which states under the education and experience section "a degree from an OT program that was ACOTE certified at the time the degree was obtained."

Example #3

A qualified occupational therapist and former Federal employee applied for a Supervisory occupational therapist position at the US Army Medical Command in Houston, TX. He applied three times as the vacancy was closed and re-opened within a two-month period. Each time, the applicant submitted his application he was not referred past the initial step of the hiring process due to the fact that he did not meeting the educational requirements. Despite the applicant's effort in providing a cover letter requesting consideration based on experience and against the general schedule supervisory guide (last update on 1998), he was not referred to the hiring officials. Furthermore, the candidate made an effort to communicate with the Human Resources Specialist at the Department of Army and her written response stated that “[b]ecause [s/he] did not see transcripts or proof of a graduate level or higher degree in Occupational Therapy in [the] application package, [the OT] was removed from further consideration. A graduate or higher level degree will be required for any position in the GS-0631 series.”

Meanwhile, this applicant has 20 years of management experience in rehabilitation departments in the private sector and with the Department of Veterans Affairs. He has managed a variety staff including Physical Therapists/Assistants, Occupational Therapists/Assistants, Audiologists and Speech Therapists. He is currently licensed in two states and continues to maintain his certification with NBCOT.

In summary, AOTA finds that this rigid and sometimes inconsistent practice will have a detrimental impact that not only affects job equality for seasoned therapists but also affects patient care for service members and their families. We respectfully request that OPM issue a written clarification regarding the qualifications and inclusion of experience for Occupational Therapy Series 0631. We appreciate your time and consideration in evaluating our concerns and hope to continue this dialogue as it undoubtedly impacts a multitude of occupational therapists practicing in Federal agency settings. If you have any questions please feel free to contact me directly at adelosh@aota.org or 240-482-4156.

Respectfully,

A handwritten signature in black ink, appearing to read "Ashley Delosh". The signature is written in a cursive, flowing style.

Ashley Delosh, JD
Payment Policy Specialist