

STAFFING

1. **REASON FOR ISSUE:** To revise Department of Veterans Affairs (VA) qualification standard for the occupation of Occupational Therapy Assistant, GS-0636, appointed under the authority of 38 U.S.C. § 7401(3), Appointments in Veterans Health Administration and 38 U.S.C. § 7405 (a)(1)(B), Temporary full-time appointments, part-time appointments, and without-compensation appointments.
2. **SUMMARY OF CONTENTS/MAJOR CHANGES:** This handbook contains mandatory procedures on staffing. The pages in this handbook replace the existing Occupational Therapy Assistant Qualification Standard in VA Handbook 5005, Appendix G22, in its entirety. The new standard is effective on the date of issuance of this handbook. Office of the Chief Human Capital Officer, Recruitment and Placement Policy Service will incorporate the changes into the electronic version of VA Handbook 5005, Staffing, maintained on the [Office of the Chief Human Capital Officer website](#) and the [VA Publications website](#). Significant changes include:
 - a. Revises education and experience requirements, as well as education and/or experience combinations.
 - b. Establishes license requirements.
 - c. Eliminates GS-04 grade level and establishes GS-05 as the entry-level.
 - d. Changes the full performance level to GS-08.
 - e. Revises existing assignments and establishes new assignments.
3. **RESPONSIBLE OFFICE:** Office of the Chief Human Capital Officer, Recruitment and Placement Policy Service (059).
4. **RELATED DIRECTIVES:** VA Directive 5005, Staffing.
5. **RESCISSIONS:** VA Handbook 5005, Part II, Appendix G22, dated March 17, 2006.

CERTIFIED BY:

**BY DIRECTION OF THE SECRETARY OF
VETERANS AFFAIRS:**

/s/
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APPENDIX G22. OCCUPATIONAL THERAPY ASSISTANT QUALIFICATION STANDARD

GS-0636

Veterans Health Administration

1. **COVERAGE.** [The following are requirements for appointment and placement as an] Occupational Therapy Assistant (OTA), [GS-0636] in the Veterans Health Administration (VHA). OTAs, [under the clinical direction of and in partnership with an] Occupational Therapist (OT) provide preventative, remediation and rehabilitative services to persons with mental, physical, emotional, or developmental impairments. OTAs participate with the OTs in planning and implementing complex treatment programs and apply occupational therapy procedures to patients.
2. **DEFINITIONS.**
 - a. **Journey Level.** The full performance level for this qualification standard is the GS-08 grade level.
 - b. **Creditable Experience.** To be creditable, the experience must have required the use of knowledge, skills and abilities (KSAs) associated with the scope of OTA practice. [OTAs may have gained this experience as an OTA, rehabilitation aide, volunteer or in the medical health services field.]
 - c. **Part-Time Experience.** Part-time experience is creditable according to its relationship to the full-time workweek. For example, one week of full-time credit is equivalent to two weeks of half-time work.
 - d. **[Specialty areas.** Clinical specialties may include, but are not limited to, assistive technology, driving and community mobility, environmental modification, low vision, safe patient handling, research, neurology (e.g., brain injury, spinal cord injury), geriatrics and mental health.]
3. **BASIC REQUIREMENTS**
 - a. **Citizenship.** [Be a] citizen of the United States. Non-citizens may be appointed when it is not possible to recruit qualified citizens in accordance with [38 U.S.C. § 7407(a).]
 - b. **Education.** [Individuals must meet at least one of the requirements below:]
 - (1) Associate's [or higher] degree in occupational therapy from a college or university accredited by the Accreditation Council for Occupational Therapy Education (ACOTE) of the American Occupational Therapy Association (AOTA).

- (2) [Completion of a military training program in an OTA program accredited by the ACOTE.]
- c. **[Certification.** OTAs must have written documentation that they have passed the entry-level certification examination for OTAs administered by the National Board for Certification in Occupational Therapy (NBCOT).
- d. **Licensure.** OTAs must hold a full, current, and unrestricted state license to practice occupational therapy in a State, Territory, a Commonwealth of the United States (i.e. Puerto Rico) or in the District of Columbia.
- e. **Loss of Credential.** [Management officials, in collaboration with Human Resource (HR) Office staff] must remove employees in this occupation who fail to maintain the required state or territorial licensure and the NBCOT certification, both current and in good standing, which may result in termination of employment.
- f. **Exceptions for Non-Certified or Non-Licensed Occupational Therapy Assistant.**
 - (1) OTAs who graduated from an ACOTE approved occupational therapy assistant program but do not possess the NBCOT certification and/or licensure requirements, may be appointed, pending licensure and/or NBCOT certification, on a full-time temporary appointment under the authority of 38 U.S.C. § 7405(a)(1)(B) and not to exceed two years in accordance with the timeframe in 38 U.S.C. § 7405(c)(2).
 - (2) OTAs may only be appointed at the entry grade level and may not be promoted/converted until licensure and/or certification are obtained.
 - (3) OTAs may provide care only under the direct supervision of a licensed OTA or OT who meets all state regulatory requirements.
 - (4) Temporary OTA appointments may not be extended beyond two years.
- g. **Failure to Obtain License.** In all cases, uncertified and/or unlicensed OTAs must actively pursue meeting certification requirements and/or State prerequisites for licensure starting from the date of their appointment. At the time of appointment, the HR Office staff will provide the uncertified and/or unlicensed OTA the written requirements for licensure and/or certification, the date by which the license and/or certification must be obtained and the consequences for not becoming licensed and/or certified by the deadline. OTAs who fail to obtain a license and/or certification by the prescribed date will be removed from their OTA, GS-0636 position, which may result in termination of employment.
- h. **Grandfathering Provision.** All individuals employed in VHA in this occupational series or in another occupational series that are also performing the duties as

PART II

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described in the qualification standard on the effective date of this qualification standard are considered to have met all qualification requirements for the grade held, including positive education and licensure/certification/registration that are part of the basic requirements of the occupation. For employees who do not meet all the basic requirements required in this standard, but who met the qualifications applicable to the position at the time they were appointed to it, the following provisions apply:

- (1) Employees may be reassigned, promoted up to and including the full performance (journey) level or changed to lower grade within the occupation, but may not be promoted beyond the journeyman level or placed in supervisory or managerial positions.
- (2) Employees in an occupation that requires a licensure/certification/registration only at higher grade levels must meet the licensure/certification/registration requirement before they can be promoted to those higher grade levels.
- (3) Employees who are appointed on a temporary basis prior to the effective date of the qualification standard may not have their temporary appointment extended or be reappointed, on a temporary or permanent basis until they fully meet the basic requirements of the standard.
- (4) Employees who are converted to title 38 hybrid status under this provision and subsequently leave the occupation lose protected status and must meet the full VA qualification standard requirements in effect at the time of reentry to the occupation.
- (5) Employees initially grandfathered into this occupation, who subsequently obtain additional education and/or licensure/certification/registration that meet all the basic requirements of this qualification standard must maintain the required credentials as a condition of employment in the occupation.

- i. **Physical Requirements.** See VA Directive and Handbook 5019[, Employee Occupational Health Service].
- j. **English Language Proficiency.** OTA candidates must be proficient in spoken and written English [in accordance with 38 U.S.C. § 7403(f).]

4. GRADE DETERMINATIONS. In addition to the basic requirements for employment, the following criteria must be met when determining the grade of candidates.

[]

a. **Occupational Therapy Assistant, GS-05**

- (1) **Experience.** [None beyond the basic requirements.]

(2) **Knowledge, Skills and Abilities.** [None.]

(3) **Assignment.** [Employees at this grade level serve in an OTA entry level developmental position under direct clinical direction and partnership of an OT. The treating OT is available on a regularly scheduled basis to review the practice of the OTA and support the OTA in the performance of his/her services. OTAs perform preliminary chart review including medical history and looking for contraindications for treatment. They provide functional and purposeful intervention to enhance safety, wellness, performance in activities of daily living (ADL) and instrumental activities of daily living (IADL), education, work, play, leisure and social participation. OTAs recommend treatment changes based on changes in physical, mental, and/or medical status of the patient. They follow guidelines from the AOTA, The Joint Commission (TJC) and current VHA policy and protocols as instructed by supervisor.]

b. Occupational Therapy Assistant, GS-06

(1) **Experience.** One year of creditable experience equivalent to the next lower grade level.

(2) **Knowledge, Skills and Abilities.** [In addition to the experience above, the candidate must demonstrate the following KSAs:

(a) Knowledge of evidence-based occupational therapy practice.

(b) Knowledge of basic group techniques and interpersonal communication

(c) Skill in written communication to document data, progress/change in status, discharge status, and patient or caregiver education.

(d) Skill in oral communication to document data, progress/change in status, discharge status, and patient or caregiver education.

(e) Ability to assist in the development of treatment goals/objectives.

(f) Ability to implement a patient care plan incorporating activity analysis theory.]

(3) **Assignment.** Employees at this grade level serve in an OTA [developmental] position. OTAs receive ongoing guidance from more experienced staff members and require clinical direction by the treating OT. They complete a preliminary review/examination of patient data to select, adapt and implement basic intervention plans for the prevention, remediation and rehabilitation of non-complex diagnoses. OTAs recommend changes in treatment based on changes in physical, mental and/or medical status of the patient. They prepare and present written and oral patient care reports. OTAs perform non-direct patient care tasks including, but not limited to, coordinating schedules with team members and monitoring inventory of clinical supplies. They

actively participate in patient/family meetings to identify patient's needs, report on patient goals and progress. OTAs communicate patient progress and any additional patient needs/treatment modifications to the OT. OTAs may provide clinical supervision (Note, this does not constitute supervisory control) to OTA students that will include promoting clinical reasoning and reflective practice, as well as ethical practice and professional competency development.

c. Occupational Therapy Assistant, GS-07

- (1) **Experience.** One year of creditable experience equivalent to the next lower grade level.
- (2) **Knowledge, Skills and Abilities.** [In addition to the experience above, the candidate must demonstrate the following KSAs:
 - (a) Skill in promoting occupational therapy services effectively, providing training and interventions within the assigned areas
 - (b) Ability to perform in depth chart review to identify treatment goals and implement treatment plans.
 - (c) Ability to use problem-solving skills when providing therapeutic interventions for patients.
 - (d) Ability to provide multi-step instructions to patients, caregivers and other health care professionals adapting instructions to meet the learning needs of the individual.]
- (3) **Assignment.** Employees at this grade level serve in an OTA [developmental] position. OTAs receive guidance from more experienced staff members and/or treating OT, for patients with comorbidities and/or requiring complicated interventions. They grade and adapt treatment interventions to maximize patient's functional status. OTAs provide education regarding ways to structure activities and areas of occupation for patients to family members, other care professionals and program staff. They interact with patient and family to explain therapy procedures and discuss treatment plans to comply with indicated regimens and post discharge activities. OTAs may provide clinical supervision (Note, this does not constitute supervisory control) to OTA students and other healthcare practitioners. This will include promoting clinical reasoning and reflective practice, as well as ethical practice and professional competency development. They provide department in-service training and provide caregiver and home management training to patients and families. OTAs assist in the orientation of, and may function as a preceptor to, employees and students new to the unit as assigned and promotes occupational therapy within the facility.

d. **[Occupational Therapy Assistant, GS-08]**

- (1) **Experience.** One year of creditable experience comparable to the next lower grade level.
- (2) **Knowledge, Skills and Abilities.** In addition to the experience above, the candidate must demonstrate the following KSAs:
 - (a) Ability to implement delegated assessments.
 - (b) Ability to provide reports of observations and patient performance.
 - (c) Ability to use complex therapeutic techniques and interventions, utilizing problem-solving skills to maximize patient's functional status.
 - (d) Ability to modify therapeutic interventions for simple and complex cases with a wide range of diagnoses and disabilities.
 - (e) Ability to recommend complex adaptive and assistive devices and durable medical equipment.
 - (f) Ability to consult with health care practitioners about the patient's treatment plan and the occupational therapy scope of practice and services.
- (3) **Assignment.** Employees at this grade level serve as a full performance level OTA. OTAs at this level receive minimum guidance from the OT and seek guidance for more complex patients and specialized treatment procedures. They contribute to the screening, evaluation and re-evaluation process by administering delegated assessments and reporting observations and patient performance to the OT. OTAs plan, coordinate and administer occupational therapy treatment for prevention, remediation and rehabilitation of diverse diagnoses in all practice areas to both individuals and groups as well as develop and implement new programs. They recommend and modify assistive devices and instruct patients on their care and use to ensure optimal performance. OTAs independently provide patient education on areas of occupation, assistive devices and orthotics based on patient's and families' level of cognition, cultural and/or behavioral variables. OTAs collaborate with the interdisciplinary team to make recommendations for the patient's rehabilitation, reintegration and disposition needs. They develop, participate in and ensure compliance with quality improvement activities through participation in medical center/section committees as delegated.

e. **Occupational Therapy Assistant, GS-09**

- (1) **Education and Experience.** One year of creditable experience comparable to the next lower grade level which demonstrates the knowledge, skills and abilities

- related to the duties of the position being filled. In addition, the candidate must demonstrate one of the following:
- (a) A minimum of 2000 hours of clinical practice directly in the specialty area and completion of 60 contact hours of continuing education directly related to the specialty area. This time must be within the past five years; or
 - (b) Certification in specialty area; or
 - (c) An additional academic degree related to the healthcare mission.
- (2) **Knowledge, Skills and Abilities.** In addition to the experience and education requirements above, the candidate must demonstrate the following KSAs.
- (a) Skill in the utilization of delegated assessment tools to assist in developing individualized treatment plan related to specialty area.
 - (b) Skill in developing protocols and procedures for specialized intervention techniques and programs.
 - (c) Ability to independently implement treatment plan using specialty skills and complex techniques.
 - (d) Ability to provide complex evidence-based interventions related to clinical specialty.
 - (e) Ability to provide consultation and mentoring to other healthcare practitioners and stakeholders in area of specialty.
- (3) **Assignment.** For all assignments above the full performance level, the higher-level duties must consist of significant scope, complexity (difficulty), variety, and be performed by the incumbent at least 25% of the time. Employees at this grade level serve as advanced OTAs with additional education and experience for treatment of patients with multiple comorbidities and diagnoses. Advanced OTAs apply advance practice skills to treat patients with complex diagnoses, including independently choosing personalized seating and positioning, creating and fabricating adaptive devices, etc. Advanced OTAs possess a higher-level of clinical competence and serve as a consultant to other OTAs. They serve as subject matter experts in comprehensive rehabilitation programs such as, but not limited to, assistive technology, driving and community mobility, environmental modification, low vision, safe patient handling, research, neurology (e.g., brain injury, spinal cord injury), geriatrics and mental health. Advanced OTAs may participate in clinical research/outcomes studies, applying related interventions, testing new products/techniques and protocol and program development. They mentor other staff to facilitate skill development related to area of expertise.

Advanced OTAs provide education within the facility related to diverse specialty areas and on new trends in area of expertise. They promote occupational therapy within the facility, community, and/or nationally.

f. Lead Occupational Therapy Assistant, GS-09

- (1) **Experience.** One year of creditable experience equivalent to the next lower grade level which demonstrates the knowledge, skills and abilities related to the duties of the position being filled.
- (2) **Knowledge, Skills and Abilities.** In addition to the experience above, the candidate must demonstrate the following KSAs:
 - (a) Ability to organize work, set priorities and delegate tasks/responsibilities to meet deadlines.
 - (b) Ability to mentor/coach other staff in advanced clinical guidelines and best practices.
 - (c) Ability to manage staffing requirements and priorities and coordinate work assignments to complete duties in a timely manner.
 - (d) Ability to assist with OT program development, outcome management and strategic planning.
 - (e) Ability to serve as a liaison between OT staff and department leadership.
- (3) **Assignment.** For all assignments above the full performance level, the higher-level duties must consist of significant scope, complexity (difficulty), and variety, and be performed by the incumbent at least 25% of the time. Lead OTAs work with the supervisor to monitor and make work assignments, provide input on performance, resolve daily workplace issues and maintain efficient workflow. Lead OTAs will lead three or more GS-8 OTA positions. Lead OTAs coordinate staff assignments with therapy department leadership for long-term strategic planning and coverage. They communicate between staff and department leadership and serve as a liaison between occupational therapy and other departments. Lead OTAs serve as a consultant to other OTAs and provide clinical practice guidance to other occupational therapy staff. Lead OTAs duties may also include managing the staff and/or clinical education program. Lead OTAs utilize appropriate reports and/or mechanisms (e.g., OT consult completion, OT productivity, employee accident forms) to identify system problems or noncompliance to standards. They maintain personal productivity and assists the section in maintaining/increasing effectiveness and efficiency in meeting its objectives.

g. Occupational Therapy Assistant (Program Coordinator), GS-10

- (1) **Experience.** One year of experience comparable to the next lower level which demonstrates the knowledge, skills and abilities related to the duties of the position to be filled.
- (2) **Knowledge, Skills and Abilities.** In addition to the experience above, the candidate must demonstrate the following KSAs:
 - (a) Knowledge of contemporary occupational therapy within specialty program to provide advocacy, consultation and education to internal and external stakeholders.
 - (b) Skill in management, administration and/or education methodologies, e.g., monitoring and tracking data, using available resources effectively and generating reports for leadership.
 - (c) Ability to coordinate the operations of multi-disciplinary teams and departments.
 - (d) Ability to obtain resources and evaluate effectiveness to ensure operation and performance improvement of the program.
 - (e) Ability to develop programs, policies and procedures to meet specialty area goals and external accreditation requirements.
 - (f) Ability to serve as a facilitator in coordinating program initiatives among multiple teams and departments.
- (3) **Assignment.** For all assignments above the full performance level, the higher-level duties must consist of significant scope, complexity (difficulty), and variety, and be performed by the incumbent at least 25% of the time. OTAs (Program Coordinator) at this level have experience that demonstrates advanced practice skills and judgment across one or more areas of occupational therapy. OTAs at this level manage all aspects of a distinct program of service within the facility, Veteran Integrated Service Network (VISN), or national and/or regional level. OTAs may be assigned broad administrative responsibility for one or more specialty practice areas, such as, but not limited to, assistive technology, brain injury, spinal cord injury, chronic pain, geriatrics, student clinical education/fellowship/residency programming and mental health. They oversee operations and/or management of key clinical, training, research, and/or administrative programs. OTAs (Program Coordinator) develop and implement programs, policies and procedures to meet program goals, policy and external accreditation requirements at the facility, VISN, national and/or regional level. They monitor outcomes and implement strategies for program improvement. The OTA (Program Coordinator) develops and implements short- and long-term goals and objectives consistent with the program's strategic plan.

h. Supervisory Occupational Therapy Assistant, GS-10

- (1) **Experience.** One year of experience comparable to the next lower level which demonstrates the knowledge, skills and abilities related to the duties of the position to be filled.
- (2) **Knowledge, Skills and Abilities.** In addition to the experience above, the candidate must demonstrate the following KSAs:
 - (a) Knowledge of national, state and local regulations, policies and procedures.
 - (b) Skill in effective communication and conflict resolution.
 - (c) Ability to apply knowledge of contemporary occupational therapy across multiple areas of practice to provide clinical guidance.
 - (d) Ability to provide the full range of administrative and supervisory duties which include assigning work, performance evaluations, selection of staff, recommendation of awards, advancements and disciplinary actions.
 - (e) Ability to analyze data to optimize quality, performance and productivity of staff and services.
 - (f) Ability to delegate authority to accomplish program goals and adapt to changing priorities.
 - (g) Ability to manage advocacy roles and planning activities within the VA and the greater rehabilitation community.
- (3) **Assignment.** For all assignments above the full performance level, the higher-level duties must consist of significant scope, complexity (difficulty), and variety, and be performed by the incumbent at least 25% of the time. Responsible for the supervision, administrative management and direction of the OT program in a rehabilitation service or equivalent service-level department which consists of at least three clinical employees and other assigned staff. Supervisory OTAs demonstrate autonomy in performing supervisory responsibilities that include, but are not limited to, assigning work to employees, monitoring workload and clinical volume, reviewing work of employees to assure accuracy and validity of submissions, assuring adequate clinical staffing, imposing disciplinary measures, recommending awards and monitoring clinical privileges of assigned staff. They analyze and review data (e.g., productivity, workload, documentation, etc.) to identify programmatic issues and develop solutions/strategies resulting in performance improvement. Supervisory OTAs provide requested facility and/or departmental reports to hospital management and monitors the standard of clinical services delivered. The develop and implement policies and

procedures to address focused clinical needs and the overall services delivered and provided within the section.]

5. DEVIATIONS.

- a. An approving official may, under unusual circumstances, approve reasonable deviations to the grade determination requirements for an employee whose composite record of accomplishments, performance and qualifications, as well as current assignment, warrants such action based on demonstrated competence to meet the requirements of the proposed grade and/or assignment.
- b. The placement of individuals in grade levels or assignments not described in this standard must be approved by the Under Secretary for Health in VHA Central Office prior to placement in the position.
- c. Under no circumstances will the educational or credential requirement be waived for those occupations with a positive education requirement or when specific credentials are identified as necessary to meet minimum requirements, unless an exception is annotated in the qualification standard.

Authority: 38 U.S.C. §§ 7401, Appointments in Veterans Health Administration; 7402, Qualifications of appointees; 7403, Period of appointments; promotions; 7405, Temporary full-time appointments, part-time appointments, and without-compensation appointments; 7407, Administrative provisions for section 7405 and 7406 appointments.