

Justification from the American Occupational Therapy Association (AOTA) regarding the decision to exclude results for occupational therapists

The American Occupational Therapy Association (AOTA) recommends that CMS reference the results for physical therapists, as occurred in the prior 2008 survey, to inform future payment updates for their specialty for the following reasons. After a review by member experts and comparing the CPI Survey results for provider compensation for occupational therapists to the results of internal studies, the AOTA believes that the CPI Survey respondents included salaries for occupational therapy assistants with provider compensation instead of including these salaries with clinical staff compensation, leading to skewed data for these expense categories.

The AOTA is also concerned that the practices who responded to the survey and provided occupational therapy data may differ from the typical practices in which occupational therapists work. Given these concerns and the fact that occupational therapists and physical therapists provide complimentary services, generally use similar billing codes, and have similar indirect practice expense, the AOTA expects expenses for occupational therapy practices to be similar to expenses for physical therapy practices.