

Submitted electronically via: [PRMR Clinician Draft Committee Roster 2023 | Partnership for Quality Measurement \(p4qm.org\)](#)

Dear Partnership for Quality Measurement (PQM):

The American Occupational Therapy Association (AOTA) is the national professional association representing the interests of more than 213,000 occupational therapists, occupational therapy assistants, and students of occupational therapy. The practice of occupational therapy is science-driven, evidence-based, and enables people of all ages to live life to its fullest by promoting health and addressing the functional effects of illness, injury, and disability. Occupational therapy is a critical component of value-based care programs and is targeted to maximizing patients' health, function, and quality of life. The primary goal of occupational therapy is to enable people of all ages to participate in the activities of everyday life.

AOTA appreciates the opportunity to comment on the PRMR Clinical Draft Committee Roster and commends PQM for their efforts to increase transparency.

We encourage PQM to consider adding an occupational therapy practitioner, along with other healthcare professionals who participate in several CMS programs where these measures will be used, to the PRMR Clinical Committee. Occupational therapy services are provided by licensed occupational therapists and occupational therapy assistants in a wide variety of settings, including: outpatient clinics, primary care offices, private practices, patient homes, hospitals, inpatient rehabilitation facilities, skilled nursing facilities, home health agencies, and more. Excluding the voice of occupational therapy practitioners further contributes to the inadequate number of measures that show the value of rehabilitation services. Additionally, occupational therapy practitioners have a unique perspective due to their expertise in supports and barriers to participating in daily activities, physical function, cognition, mental health, and social determinants of health.

We look forward to a continuing dialogue and collaboration with Battelle's PQM regarding measures that affect the ability of occupational therapy practitioners to provide quality care to people, populations, and communities.

Sincerely,



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