

Via electronic submission to <https://p4qm.org/endorsement/measure/6011>

June 21, 2023

Dear Partnership for Quality Measurement:

The American Occupational Therapy Association (AOTA) appreciates this opportunity to comment on measure **3747, Engagement in Community-Based Mental Health Care After Mental Health Hospitalization**. AOTA is the national professional association representing the interests of more than 230,000 occupational therapists, students of occupational therapy (OT), and occupational therapy assistants. Occupational therapy defines “occupations” as any meaningful or purposeful activity, which can describe activities of daily living (ADLs), instrumental activities of daily living (IADLs), work, school, hobbies, and social participation. The practice of occupational therapy is person-centered, evidence-based, and enables people of all ages to live life to its fullest by promoting health and purposeful activity. AOTA believes that understanding a person’s whole health, including function, environment, and context are crucial.

AOTA supports the intent of this measure, improving follow up after a hospitalization for mental illness or intentional self-harm. However, there are additional details AOTA would like to bring to your attention.

#### Denominator Inclusion Criteria:

**AOTA recommends individuals dually enrolled in Medicaid and Medicare be included in the denominator.** According to the American Community Survey (ACS), conducted by the US Census Bureau, 51 percent of people with disabilities in the US in 2016 were between age 18 to 64.<sup>1</sup> Increased mental distress in adults with disability is associated with mental disorders, limitations in daily life, and poor health behaviors.<sup>2</sup> Furthermore, adults with disabilities experience five times more mental distress compared to those without disabilities.<sup>3</sup>

Our nation is in a mental health crisis. Prior to the pandemic, one in five adults reported having mental illness, and deaths due to drug overdose were four times higher in 2018 than 10 years prior. As of January 2021, as a result in part to the COVID-19 pandemic, 41% of U.S. adults reported symptoms of anxiety or depressive disorder occurring more than half or nearly every day.<sup>4</sup> At the same time, there is a documented shortage of mental health professionals, with at least 152 million Americans living in a mental health professional shortage area.<sup>5</sup>

**Excluding individuals dually enrolled in Medicaid and Medicare who fit this measure’s target age range will leave out a significant number of individuals hospitalized for mental health care. This may lead to insufficient or the total lack of community-based mental health follow-up services.**

---

<sup>1</sup> Kraus, L., Lauer, E., Coleman, R., and Houtenville, A. (2018). 2017 Disability Statistics Annual Report. Durham, NH: University of New Hampshire.

<sup>2</sup> Cree RA, Okoro CA, Zack MM, Carbone E. (2020). Frequent Mental Distress Among Adults by Disability Status, Disability Type, and Selected Characteristics – United States 2018. Morbidity and Mortality Weekly Report (MMWR).

<sup>3</sup> See <https://www.cdc.gov/ncbddd/disabilityandhealth/features/mental-health-for-all.html>

<sup>4</sup> See <https://www.kff.org/coronavirus-covid-19/issue-brief/the-implications-of-covid-19-for-mental-health-and-substance-use>

<sup>5</sup> See <https://bhw.hrsa.gov/sites/default/files/bureau-health-workforce/data-research/behavioral-health-2013-2025.pdf>

## Numerator Inclusion Criteria:

**It will be important to ensure many varied types of mental health professionals, including occupational therapy practitioners, are within the inclusion criteria for this measure.**

Occupational therapy can have a direct, positive impact on behavioral and mental health conditions. Through engagement in meaningful occupations, occupational therapy practitioners play a transformative role in helping people with behavioral health challenges, through their expertise in occupational performance, activity analysis and design, environmental analysis, neurophysiology, psychosocial development, and group dynamics.<sup>6</sup> Occupational therapy's distinct value to behavioral health is demonstrated through use of evidence-based meaningful activities which promote participation in everyday life, which can help build resilience, positive psychological and social functioning (psychosocial function), and the ability to adapt to change and cope with life challenges.

OT practitioners address mental and behavioral health needs across the lifespan, in a variety of settings, helping individuals develop skills and removing barriers necessary to carry out meaningful occupations. They use performance-based assessments and address barriers to functioning through focus on evidence-based interventions that remediate or restore abilities, enhance existing skills, create opportunities, and promote wellness to prevent relapse through modifying or adapting the environment or activity to help individuals with psychiatric, behavioral, and substance abuse disorders achieve full participation in the everyday activities that are meaningful to the individual.<sup>7</sup> OT practitioners apply a unique perspective to mental and behavioral health through their emphasis on the relationship between occupational participation and health and well-being.<sup>8</sup> OT evaluations include an occupational profile, which provides a summary of a client's occupational history and experiences, patterns of daily living, interests, values, needs, and relevant contexts.<sup>9</sup> Furthermore, many individuals benefit from OT practitioners' non-pharmacological interventions that address depression, anxiety, and other mental health conditions that impact performance in activities of daily life.

The Accreditation Council for Occupational Therapy Education (ACOTE) requires entry-level occupational therapists are educated in the following areas related to mental health:

- Influence of neurophysiological changes, environmental factors, and contexts on mental health and the development of psychiatric conditions
- Human development and behavior throughout the lifespan, including how the emergence of mental illness influences development and the ability to participate in meaningful occupations
- Historical and contemporary perspectives on the promotion of mental health and on mental health disorders and treatment, including the consumer/survivor/ex-patient movement and concepts of resilience and recovery, trauma-informed care, social and emotional learning, peer-to-peer supports and services, and family-to-family supports and services
- Current Diagnostic and Statistical Manual of Mental Disorders taxonomy with regard to psychiatric diagnosis, etiology, symptoms, impairments, clinical course, and prognosis
- Common comorbidities with mental illnesses
- Psychiatric medication actions, side effects, and effects on functioning

---

<sup>6</sup> American Occupational Therapy Association. (2016). Occupational therapy's distinct value: Mental health promotion, prevention, and intervention across the lifespan. <https://www.aota.org/-/media/Corporate/Files/Practice/MentalHealth/Distinct-Value-Mental-Health.pdf>

<sup>7</sup> See <https://www.aota.org/~/media/Corporate/Files/Advocacy/Federal/Overview-of-OT-in-Mental-Health.pdf>

<sup>8</sup> American Occupational Therapy Association. (2017). Mental health promotion, prevention, and intervention in occupational therapy practice. *American Journal of Occupational Therapy*. November/December 2017, Vol. 71(Supplement\_2), 7112410035p1–7112410035p19. <https://doi.org/10.5014/ajot.2017.716S03>

<sup>9</sup> American Occupational Therapy Association. (2020). Occupational therapy practice framework: Domain and process (4th ed.). *American Journal of Occupational Therapy*, 74(Suppl. 2), 7412410010. <https://doi.org/10.5014/ajot.2020.74S2001>

For more information about OT practitioners' roles in mental health, see [https://research.aota.org/ajot/article/71/Supplement\\_2/7112410035p1/6365/Mental-Health-Promotion-Prevention-and](https://research.aota.org/ajot/article/71/Supplement_2/7112410035p1/6365/Mental-Health-Promotion-Prevention-and).

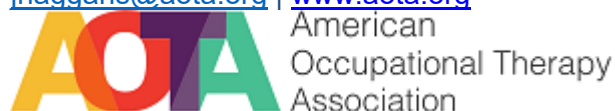
Currently, OT practitioners are included as qualified mental health providers in more than ten states, with legislation pending in other states. Other states have included OT practitioners in the certified community behavioral health clinic's allowable service list. **Given occupational therapy practitioners' key role in addressing behavioral and mental health, it is critical that occupational therapy services be included in this measure.** Adding Occupational therapy services in the inclusion criteria for this measure will help mitigate the lack of access for these vital mental health services.

Thank you for the opportunity to comment on measure **3747, Engagement in Community-Based Mental Health Care After Mental Health Hospitalization**. AOTA looks forward to a continuing dialogue with Battelle's Partnership for Quality Measurement regarding measures that affect the ability of occupational therapy practitioners to provide quality care to people, populations, and communities.

Sincerely,



Jamar Haggans, MS, OTR/L  
Director of Quality  
American Occupational Therapy Association, Inc.  
6116 Executive Blvd #200  
North Bethesda, MD 20852-4929  
240.482.4158 (Direct Dial)  
[jhaggans@aota.org](mailto:jhaggans@aota.org) | [www.aota.org](http://www.aota.org)



AOTA  
American  
Occupational Therapy  
Association