

Submitted electronically via [Guidebook of Policies and Procedures for PRMR and MSR | Partnership for Quality Measurement \(p4qm.org\)](#)

Partnership for Quality Measurement (PQM)
Battelle
505 King Avenue Columbus, OH 43201

Dear Partnership for Quality Measurement (PQM) Team:

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 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. Occupational therapy is a critical component of value-based care programs and is targeted to maximizing patients' health, function, and achieving and maintaining independence and safety. 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 Guidebook of Policies and Procedures for Pre-Rulemaking Measure Review (PRMR) and Measure Set Review (MSR). We encourage PQM to reassess the timeline for the MSR. AOTA, along with several other associations, devotes significant resources to analyzing the proposed rules, determining the potential impact on our members, and developing comments. We are concerned that if the proposed timeline is not modified, PQM will not receive full member input during the endorsement period.

AOTA supports the new process, allowing increased member participation. We encourage Battelle to purposefully allow adequate input and participation from a variety of healthcare professionals, such as occupational therapy practitioners and other allied health professionals.

We look forward to continued 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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