

OT Assistants

What do the rules and law say about OT Assistants?

Under Oregon law, ORS 675.210(4) "Occupational therapy assistant" means a person licensed to assist in the practice of occupational therapy under the supervision of an occupational therapist."

How does an OT Assistant have to be supervised?

The Oregon rules relating to Supervision of OT Assistant is found under OAR 339-010-0035 Statement of Supervision for Occupational Therapy Assistant:

- (1) Any person who is licensed as an occupational therapy assistant may assist in the practice of occupational therapy only under the supervision of a licensed occupational therapist.
- (2) Before an occupational therapy assistant assists in the practice of occupational therapy, he/she must file with the Board a signed, current statement of supervision of the licensed occupational therapist who will supervise the occupational therapy assistant. The signature of the supervising occupational therapist must be notarized.
- (3) An occupational therapy assistant always requires at least general supervision
(emphasis added)
- (4) The supervising occupational therapist shall provide closer supervision where professionally appropriate.
- (5) The supervisor, in collaboration with the supervisee, is responsible for setting and evaluating the standard of work performed.

What is the definition of Supervision? 339-010-0005: Definitions

- (1) "**Supervision**", is a process in which two or more people participate in a joint effort to promote, establish, maintain and/or evaluate a level of performance. The occupational therapist is responsible for the practice outcomes and documentation to accomplish the goals and objectives. Levels of supervision:
 - (a) "**Close Supervision**" requires daily, direct contact in person at the work site;
 - (b) "**Routine Supervision**" requires the supervisor to have direct contact in person at least every two weeks at the work site with interim supervision occurring by other methods, such as telephone or written communication.
 - (c) "**General Supervision**" requires the supervisor to have at least monthly direct contact in person with the supervisee at the work site with supervision available as needed by other methods. . . .
- (3) "**Licensed occupational therapy practitioner**", for purposes of these rules, means an individual who holds a current occupational therapist or occupational therapy assistant license.

Check on the web site at www.otlb.state.or.us under Supervision for the Board adopted AOTA Supervision Guidelines. Some of the specific questions the board has answers about supervision for OT Assistants follow:

1. Can an OT Assistant perform home assessments, gather data and complete a home visit check list?

An OT may delegate home assessment data collection to an OTA. However, it is the OT's responsibility to analyze the data, make recommendations and document or co-sign findings. Gathering objective data falls within the OT Assistant's scope of practice. The supervising OT interprets the data and works collaboratively with the OT Assistant to make recommendations.

2. Can an OT Assistant begin an evaluation?

Evaluations of patients are done by Occupational Therapists. The OTA, if trained, may perform the chart review and collect information from the team. The OT Assistant must then discuss the case with the supervising OT. An OT Assistant can proceed with starting the evaluation in the manner directed by the supervising OT. All evaluation interpretation must be done by the OT.

3. Can an OT Assistant administer the PCE (Physical Capacity Evaluation) or other standardized tests?

The OT Assistant must have the training and experience to administer the PCE or any other standardized test. The OT Assistant can collect information; however, the OT must be involved with the interpretation of the data results. For example the OT Assistant can get numbers for a pinch or grip, but the OT must interpret the numbers. The patient can work on the treadmill and the OT Assistant can collect the data, but those numbers must be interpreted by the OT. An OT Assistant with appropriate skills can test a worker's lift tolerance, but the OT is responsible for the projections made.

An OT Assistant with the skills could not grade fine motor dexterity tests such as the Perdue and Minnesota Manual Dexterity Test and grip strength for validity purposes, because this interpretation is the responsibility of the OT. The OT is responsible for writing the assessment and determining evaluation validity and work categories. With training the OT Assistant can perform muscle testing and goniometry measurement tests. The measurements and test results must be interpreted by the OT.

Generally for all tests, the OT Assistant works in collaboration with the OT. For example, for the Claudia Allen standardized test, it is the supervising OT, in collaboration with the OT Assistant that is responsible for setting and evaluating the standard of work performed. When the test requires interpretation, which is in the purview of the OT's role, but it is a collaborative decision between the OT and the Assistant how much the Assistant is involved and individual work performed. As always, the OT Assistant must always have the training and experience. When appropriate the supervising OT is responsible for providing closer supervision.

4. Can an OT assistant perform an ADL assessment before the supervising OT has performed an evaluation or become otherwise involved?

No, the ADL can only be performed under the direction of the supervising OT.

5. Can an OT Assistant teach medication management?

There are several areas where an OTA, at the direction of the supervising OT may teach medication management. In a psychological situation, the OT may teach the importance of complying with prescribed dosage and timing of medication and assessing the patient's ability to follow through. In physical disabilities setting, the OT may adapt environment or methods of application to allow patient independence with medications.

6. Can an OT Assistant recommend OT treatment prior to seeing a patient?

The OT Assistant does **not** write the treatment plan, but might, for example provide a piece of equipment such as a lapboard for UE support of a specialized eating utensil temporarily. This should be re-assessed by the supervising OT.

7. Must an OT co-sign daily/weekly notes?

There are no specific rules as to signing of notes. It may not be mandatory but is always a good idea. If there is no change in treatment plan or goals it is not as important as when there are changes to the plan or goals, which then makes it the responsibility of the OT and should have the OT initials.

8. Can an OT Assistant discharge patients?

An OT Assistant cannot discharge a patient on their own. The decision requires discussion between the OT and Assistant. The OT has final responsibility for making discharge decisions.

9. Can an OT Assistant prepare a Discharge Summary or sign one?

It is the responsibility of the OT to make decisions about whether a patient can be discharged. If there is no change in the plan or goals, the OT Assistant can finalize the discharge, but the summary should be co-signed by the OT who has the final responsibility for the discharge decision. It is clear that an OT Assistant must work under the supervision of an OT and that means a "process in which two or more people participate in a joint effort to promote, establish, maintain and/or evaluate a level of performance". The OT is responsible for program outcomes and documentation to accomplish them.

In general it is recommended that an OT co-sign discharge summaries and this is common practice. However, the Board acknowledged that in some cases when an OT Assistant is not adding to or amending the goals and is simply summing up the progress, not changing charting or planning in any way, the OT Assistant can sign the summary. The board noted that in some facilities the discharge summaries are not signed at all. The conclusion of the Board in discussion of this issue at the January, 2004 meeting was that the OT does not have to co-sign the discharge summary in all cases.

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