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September 26, 2023

On behalf of the Oklahoma Recreational Therapy Association (ORTA), I would like to extend my thanks to you and the National Standards of Practice Team for an opportunity to provide comment on the proposed Standards of Practice for Recreation Therapists within the Department of Veterans Affairs (VA). My comments for the ORTA will be arranged according to the individual standards and then the specific questions posed in the RFI located in the Federal Register (Vol. 88, No. 144, p. 48965).

Proposed National Standard of Practice for Recreation Therapists #1:

*“Recreation Therapists systematically use recreation and activity-based interventions for the specific purpose of improving the physical, social, emotional, cognitive and spiritual functioning of individuals; enhancing wellbeing; and enabling greater quality of life through recreation participation for individuals with injury, illness or disability. Recreation Therapists utilize treatment interventions, leisure education and recreation experiences to improve functional abilities, foster recovery, enhance health and wellness, promote the development and maintenance of a healthy leisure lifestyle and increase independent participation in activities of choice through activity modification, adaptation and facilitation.”*

Comment on Proposed National Standard of Practice for Recreation Therapists #1:

ORTA appreciates the thoroughness of this definition of the profession and the practice of recreational therapy. Additionally, we appreciate the referencing information provided on the ATRA website (the National Professional Organization representing recreational therapists). However, we would recommend that this explanation omit the following phrases

*“...promote the development and maintenance of a healthy leisure lifestyle and increase independent participation in activities of choice through activity modification, adaptation and facilitation.”* We feel that these phrases shift the focus of our services away from functional outcomes (as identified earlier in the statement) towards the idea of a leisure lifestyle. While Recreational Therapists certainly assist veterans with their leisure, the purpose of our services is functional outcomes. This is specifically supported in language from the Centers of Medicaid and Medicare Services (CMS) emphasizing “active treatment.” In addition to the language we support in proposed standard #1, we would direct you to the ATRA definition of recreational therapy where we state “recreational therapy means a treatment service designed to restore, remediate and rehabilitate a person’s level of functioning and independence in life activities, to promote health and wellness as well as reduce or eliminate the activity limitations and restrictions to participation in life situations caused by an illness or disabling condition. We also would like to direct your attention to the ORTA website which provides a definition of recreational therapy which mirrors ATRA and CMS <https://orta-okstate.com/>.

Proposed National Standard of Practice for Recreation Therapists #2:

*“Recreation Therapists in VA possess the education and certification required by VA qualification standards. See VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019.”*

Comment on Proposed National Standard of Practice for Recreation Therapists #2:

ORTA is supportive of this Proposed Standard of Practice as written.

Proposed National Standard of Practice for Recreation Therapists #3:

*“VA Recreation Therapists practice in accordance with the Standards for the Practice of Recreational Therapy from ATRA available at: <https://www.atra-online.com/>. VA reviewed license and certification requirements for this occupation in June 2023 and confirmed that all Recreation Therapists in VA follow the ATRA standards.”*

Comment on Proposed National Standard of Practice for Recreation Therapists #3:

ORTA is particularly appreciative of the reference to the ATRA Standards of Practice. We believe that adherence to these standards will greatly enhance the quality of care provided by all recreational therapists. However, there are four points that we would like to address here.

1. We are aware that not all recreational therapists within the VA system follow the ATRA

Standards of Practice.

2. We would strongly recommend all recreational therapists within the VA system to purchase a copy of the ATRA Standards of Practice.
3. We would strongly recommend that all recreational therapists within the VA system regularly utilize the Self-Assessment Guide located within the ATRA Standards of Practice. This Self-Assessment Guide is an excellent tool to provide recreational therapists with information regarding their adherence to the ATRA Standards of Practice.
4. We would strongly recommend that all recreational therapists within the VA participate in a training provided by ATRA on the use of both the ATRA Standards of Practice and the accompanying Self-Assessment Guide.

Proposed National Standard of Practice for Recreation Therapists #4:

*“Although VA only requires a certification, five States require a State license in order to practice as a Recreation Therapist in that State: New Hampshire, New Jersey, North Carolina, Oklahoma and Utah. Of those, the following State exempts Federal employees from its State license requirements: Oklahoma.*

*VA reviewed license and certification requirements for this occupation in June 2023 and confirmed that there is no variance in how VA Recreation Therapists practice in any State.”*

Comment on Proposed National Standard of Practice for Recreation Therapists #4:

ORTA is supportive of this Proposed Standard of Practice and agrees with the information provided. However, we would like to strongly recommend that the VA recommend in its strongest terms that Recreational Therapists within the VA system obtain licensure where applicable. Additionally, we would like to state that ORTA only recognizes individuals who possess the CTRS credential along with the medical license for recreational therapy in the State of Oklahoma as qualified providers of recreational therapy services.

Request for Information Question #1:

*Are there any required trainings for the aforementioned practices that we should consider?*

ORTA Response: As mentioned in our comments on Proposed National Standard of Practice for Recreation Therapists #3, we strongly recommend that all recreational therapists within the VA

purchase and utilize the ATRA Standards of Practice and Self-Assessment Guide. We also strongly recommend that all recreational therapists within the VA complete the ATRA training on using the ATRA Standards of Practice and Self-Assessment Guide. Additionally, we strongly recommend that all Recreational Therapists within the VA system complete the ATRA Quality Internship Supervisor Training. This training is designed to prepare internship supervisors to handle a myriad of issues and provides a consistent curriculum we are promoting for all recreational therapy internship supervisors. This training will allow Recreational Therapists within the VA system to have the most up-to-date training on supervising interns that will enhance the training received by students and care received by veterans.

Request for Information Question #2:

*Are there any factors that would inhibit or delay the implementation of the aforementioned practices for VA health care professionals in any States?*

ORTA Response: ORTA is not aware of any factors that would inhibit or delay the implementation of the aforementioned practices for VA health care professionals in any States.

Request for Information Question #3:

*Is there any variance in practice that we have not listed?*

ORTA Response: The only variance ORTA is aware of is recreational therapists in licensed states who are providing recreational therapy within the VA system without a license. As mentioned above, we strongly recommend the VA recommend in its strongest terms that all recreational therapists within the VA obtain their license where applicable. Additionally, as mentioned above, where recreational therapists have the ability to obtain their license, but elect not to, the only credential recognized by ORTA is the Certified Therapeutic Recreation Specialist (CTRS) with a state license.

Request for Information Question #4:

*What should we consider when preempting conflicting State laws, regulations or requirements regarding supervision of individuals working toward obtaining their license or unlicensed personnel?*

ORTA Response:

When considering preempting conflicting state laws, regulations or requirements regarding the

supervision of individuals working toward obtaining their license or unlicensed personnel, ORTA strongly recommends consideration of the Certified Therapeutic Recreation Specialist (CTRS) credential. ORTA only supports individuals with the CTRS/L as the qualified provider of recreational therapy services.

Request for Information Question #5:

*Is there anything else you would like to share with us about this national standard of practice?*

ORTA Response: ORTA would again like to reiterate our appreciation for the opportunity to offer feedback on the Proposed VA National Standards of Practice. If there are any remaining questions or clarification needs to be provided, please do not hesitate to contact me at [orta.okstate@gmail.com](mailto:orta.okstate@gmail.com).

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