

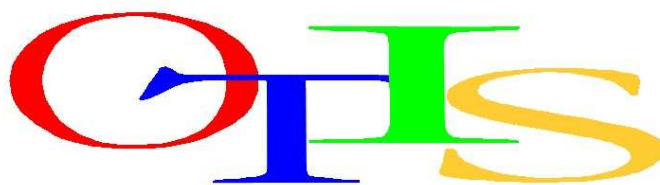
## **Ask OTIS: Documenting OT Intervention in the Schools**

***Q: What kind of logs or documentation are occupational therapists required to keep? How are they supposed to document what they are doing and what is being done to meet the goals and objectives of the IEP?***

According to the *Occupational Therapy Practice Framework* (AOTA, 2002), OTs should always record their professional activities in the areas of evaluation, intervention, and outcomes. This Ask OTIS will focus on documentation requirements related to occupational therapy intervention services in the schools. Documentation requirements for OTs who work in school systems in Washington State are regulated by the Special Education Law and the Law Relating to Occupational Therapy (OT Licensure Law).

According to the Special Education Law (WAC 392-172-160 (g)), the student's IEP must contain a description of how the student's progress toward annual goals will be measured and how the student's parents will be regularly informed of progress as well as whether progress is sufficient to achieve the goals within the annual timeline. Thus, the student's IEP should identify the type of evaluation (what will be used to evaluate the student's performance) and frequency of evaluation (how often the student's performance will be evaluated) for each identified objective. Frequency can vary from daily to weekly or monthly depending on what the IEP team determines is appropriate for the objective and for the child. The evaluation type and frequency may be identified in different ways, depending on the format of the IEP used in the child's school district. It could be entered into separate columns on the IEP or it may be embedded in the short term objective itself (e.g. "Student will write a sentence showing appropriate use of punctuation and capital letters with 80% accuracy by 4/27/06, as measured by weekly evaluation of written performance").

The special education service provider (i.e. special education teacher, occupational therapist, etc.) responsible for monitoring the objective should document (or collect data on) the student's performance according to the evaluation schedule described in the IEP. So, if the IEP specifies weekly evaluation, there should be some type of data collection done on a weekly basis. The form used for collecting the data may be specified by the child's school district or it may be left to the discretion of the service provider. However, with the changes in the special education law as a result of IDEA '97, as well as what research is telling us about best practice, therapists are working towards writing more collaborative IEPs. As a result, there often are not separate "OT goal pages." In fact, the IEP goals and objectives belong to the student, not any particular profession. These are often referred to as collaborative IEPs and have been shown to demonstrate better outcomes for students. In this case, multiple service providers share responsibility for the identified student outcomes and the therapist has an OT intervention plan that defines the unique skills and expertise the OT offers to help the student reach his or her stated outcomes. The



responsibility for collecting data on student progress may be shared among service providers or there may be one service provider who is designated as the data collector.

In addition to collecting data on the student's performance related to the identified goals and objectives, the OT should also record service delivery. However, the OT Licensure Law (Chapter 18.59 RCW) and related Administrative Codes (Chapter 246-847 WAC) and the *Standards of Practice for Occupational Therapy* (1998) developed by the American Occupational Therapy Association (AOTA) do not specify the form or content of these records. AOTA's *Standards of Practice* state: "An occupational therapy practitioner documents the occupational therapy services provided within the time frames, format, and standards established by the practice settings, agencies, external accreditation programs, and payers." This is consistent with state law which says that occupational therapists "shall accurately record ... and report information as required by facility standards and state and federal laws" (WAC 246-847-170 (7)). The OT Administrative Codes also stipulate that "data recorded in permanent files shall be supported by the occupational therapist or the occupational therapy assistant's observations or by objective measures of data collection" (WAC 246-847-170 (8)).

In addition to documenting data collection and plans for intervention, OTs also need to consider documenting the amount and type of services provided. For the past several years, schools have been required to bill Medicaid for a variety of services provided to special education students who are Medicaid eligible. OTs who bill for services under Medicaid need to record service delivery as required for reimbursement. On these forms, documentation of service delivery would include minutes of therapy, whether therapy was provided in a group or individually, a description of the treatment (gross motor, fine motor, activities of daily living, etc.), and any indirect billable services provided (such as equipment preparation). Forms used for Medicaid billing vary from school district to school district as do standards for documenting OT services for students who are not Medicaid eligible. Medicaid forms may be used for all students or separate systems may be used for different students and programs as long as the standards established by the district and other relevant agencies are met.

For more information please refer to AOTA's *Standards of Practice for Occupational Therapy* and *Occupational Therapy Practice Framework: Domain and Process*. OT Licensure Laws can be accessed through the Occupational Therapy Practice Board web site:

[https://wvs2.wa.gov/doh/hpqa-licensing/hps3/Occupational\\_Therapy/default.htm](https://wvs2.wa.gov/doh/hpqa-licensing/hps3/Occupational_Therapy/default.htm) and the Washington Administrative Codes (WACs) regulating the provision of special education services are available on line at: <http://www.k12.wa.us/SpecialEd/regulations.aspx>.

*This article was written by Dottie Handley-More, Yvonne Swinth, and Sara Woodward, OTIS Co-Chairs. It originally appeared in the WOTA Newsletter in June, 2005 (Volume 63, Number 3 p. 7).*

*OTIS (Occupational Therapists In Schools) is a standing committee for the Washington Occupational Therapy Association (WOTA) that was set up to help support therapists in school-based practice.*