

Board of Medicine

Guidance on Supervisory Responsibilities of an Occupational Therapist

Question 1: If an occupational therapist supervises occupational therapy assistants and other unlicensed personnel, who is responsible for the patient care and outcome?

Answer 1: The occupational therapist is responsible for the care and treatment provided to the patient by any licensed or unlicensed health-care providers under the supervision of the occupational therapist. 18VAC85-80-110(A)(1).

Question 2: What can an occupational therapist delegate to an occupational therapy assistant or any unlicensed health care provider?

Answer 2: There is not a list of procedures that may or may not be delegated. An occupational therapist may not delegate any task that requires a clinical decision or the knowledge, skills and judgment of a licensed occupational therapist. Occupational therapists may only delegate those tasks that do not require professional judgment and can be properly and safely performed by an appropriately trained occupational therapy assistant. 18VAC85-80-110(A)(3).

Question 3: How many personnel may an occupational therapist supervise at any one time?

Answer 3: An occupational therapist may supervise up to six occupational therapy personnel, including no more than three occupational therapy assistants, at any one time. 18VAC85-80-110(C).

Question 4: How often must the occupational therapist meet with the occupational therapy assistant to review and evaluate treatment and progress of the individual patients?

Answer 4: At a minimum, the occupational therapist must meet with the occupational therapy assistant at least once every 10th treatment session or 30 calendar days, whichever occurs first. However, this is a minimum requirement. The frequency of these meetings should be determined by the complexity of patient needs, number and diversity of patients, demonstrated competency and experience of the assistant. Check with your chief medical officer or other personnel to determine if there is a hospital policy on frequency of meetings, methods of delegation, and content of supervision. 18VAC85-80-110(B).

Question 5: Who must sign patient treatment notes?

Answer 5: Occupational therapy assistants shall document all treatment notes in the patient record performed by the assistant. Those notes must be countersigned by the supervising occupational therapist at the time of review and evaluation. 18VAC85-80-110(D).

Question 6: Who can supervise unlicensed personnel?

Answer 6: An occupational therapist or an occupational therapy assistant may supervise unlicensed personnel. 18VAC85-80-111(A).

Question 7: What procedures may unlicensed personnel perform?

Answer 7: Unlicensed personnel may perform nonclient-related tasks such as clerical duties or room preparation. They may perform client-related tasks that, in the judgment of the supervising occupational therapist or supervising occupational therapy assistant, have no potential to adversely impact the patient or the patient's treatment plan. 18VAC85-80-111(B).