

August 1, 2015

Centers for Medicare Medicaid Services

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Dear Centers for Medicare Medicaid Services Members,

We, as representatives and elected Board Members of the National Association of Activity Professionals (NAAP) are submitting an official statement regarding the proposed Medicare/Medicaid Reform of Requirements for Long-Term Care Facilities. It is our understanding that this proposed rule has pertinent and relevant revisions of requirements that all long-term care facilities must meet to participate in the Medicare/Medicaid process.

Our membership consists of credentialed and non credentialed professionals, who are and have been active in the various aspects of senior care. Credentialed health care professionals have received their credentials from one of several national credentialing bodies: National Association of Activity Professionals Credentialing Center (NAAPCC); National Council for Therapeutic Recreation Certification (NCTRC); and the National Certification Council for Activity Professionals (NCCAP).

Each professional is required to maintain current knowledge and best practices by attaining a prescribed number of Continuing Education Units (CEU) every two years. These educational trainings and inservices are essential in carrying on the level of care that is necessary for optimum Quality of Life services for our residents.

Our organization's Scope of Practice, which was created, written and adopted in 1999, Louisville, Kentucky, affirms our commitment and focus with regards to Quality of Life services:

The Activity Profession provides activity services and programs, which enables each individual to maximize his/her desired potential and personal interest in activity participation. The provisions of activity services is primarily, but not limited to, the geriatric populations who live in a variety of health care settings that may include other populations with special needs. Activity practice is based on assessment, development, implementation, documentation, and evaluation of the programs provided. In addition, the unique interests, physical, mental and psychosocial needs of each individual served is of the highest importance throughout the creation and implementation of all activity services. Activity services are directed and provided by professionals who are trained, qualified, and/or certified to provide these activity services.

The National Association of Activity Professionals provides a yearly national conference bringing quality education to its membership. Our most recent conference was held in Daytona Beach, Florida, which included twenty-six approved Continuing Education Hours from NAAPCC, NCCAP and the University of Tennessee's Personal and Professional Division.

The Activity Professional knows first hand through assessment and time spent with the individual resident their specific needs and interests. We feel the Activity Professional is a vital member of the interdisciplinary team in implementing the individualized, person centered activity plan.

We urge you, the Centers for Medicare Medicaid Services Members, to consider the fact that the above-mentioned national credentialing bodies are all equal in quality services. They each meet stringent guidelines, quality education and federal mandates required by CMS. As 483.25 C2 states, “Patient activities directed either by a qualified professional meeting the requirements or by an individual on the facility staff who is designated as the Activities Director...” Having multiple credentialing bodies keeps each one competitive, honest and meeting the highest current standards possible.

We feel the current regulations in FTAG249 are appropriate and relevant to meet the physical, mental, and psychosocial needs of the resident we serve in the various levels of care. We request that you will take our comments into careful consideration.

Respectfully submitted,

The National Association of Activity Professionals’ Board

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