



U.S. Department  
of Veterans Affairs

# **NATIONAL STANDARD OF PRACTICE: RECREATION THERAPIST**

**June 2024**

**PURPOSE:** This report provides a summary of internal and external feedback received for the draft Recreation Therapist VA national standard of practice during the comment period from July to September 2023.

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## Executive Summary

The Department of Veterans Affairs (VA) is establishing national standards of practice for health care professionals who have a license, certification, registration, or other state requirement. The VA national standards of practice are a standardized set of services that all health care professionals in a given occupation can perform while employed by VA if their VA medical facility performs such services and they have the proper education, training, and skill to perform the services. As part of a comprehensive development process to establish each occupation's national standard of practice, VA affords the public, Veterans, professional associations, VA employees, unions, and other interested parties the opportunity to provide feedback on the national standard of practice prior to finalization and publication in VA policy.

Recreation Therapists systematically use recreation and therapeutic interventions for the specific purpose of improving the physical, social, emotional, cognitive, and spiritual functioning of individuals; enhancing well-being; and enabling greater quality of life through recreation participation for individuals with injury, illness, or disability.. On July 28, 2023, VA sent letters to the National Council for Therapeutic Recreation Certification and the American Therapeutic Recreation Association to inform them of VA's intent to follow the American Therapeutic Recreation Association standards for the national standard of practice for Recreation Therapists and provided them with an opportunity to discuss the proposed national standard of practice with VA. Although the National Council for Therapeutic Recreation Certification is the certification body for Recreation Therapists, the American Therapeutic Recreation Association has developed the Standards for the Practice of Recreational Therapy. VA also sent letters to the five state licensing boards for Recreation Therapists to inform them of VA's intent to follow the certification standards for the national standard of practice for Recreation Therapists.

In addition, from July 28 to September 26, 2023, VA posted the proposed national standard of practice for VA Recreation Therapists in the Federal Register, 88 FR 48963 (<https://www.federalregister.gov/documents/2023/07/28/2023-16007/notice-of-request-for-information-on-the-department-of-veterans-affairs-recreation-therapists>) for public comment and within VA's intranet for VA employee comment.

The proposed national standard of practice for Recreation Therapists received 81 total comments across all platforms—2 responses from the state licensing boards for Recreation Therapists, 75 comments from VA employees, 2 comments from individuals from the public, 1 comment from the National Council for Therapeutic Recreation Certification, and 1 comment from the American Therapeutic Recreation Association. VA reviewed all comments received and made six changes to the national standard of practice in response to comments.

This report provides a summary of comments received on the proposed Recreation Therapist National Standard of Practice. It also provides VA's response to the comments and changes made to the national standard of practice in response to feedback received.

## Authority

Chapters 73 and 74 of title 38 of the United States Code (U.S.C.) and 38 U.S.C. 303 permit the Secretary to further regulate the Department of Veterans Affairs health care professions to

make certain that VA's health care system provides safe and effective health care by qualified health care professionals to ensure the well-being of those Veterans who have borne the battle.

On November 12, 2020, VA published an interim final rule confirming that VA health care professionals may practice their health care profession consistent with the scope and requirements of their VA employment, notwithstanding any state license, registration, certification, or other state requirements that unduly interfere with their practice. 38 CFR 17.419; 85 FR 71838. Specifically, this rulemaking confirmed VA's practice of allowing VA health care professionals to deliver health care services in a state other than the health care professional's state of licensure, registration, certification, or other state requirement, thereby enhancing Veterans' access to critical VA health care services. The rulemaking also confirmed VA's authority to establish national standards of practice for its health care professionals which would standardize a health care professional's practice in all VA medical facilities, regardless of conflicting state laws, rules, regulations, or other state requirements.

The rulemaking explained that a national standard of practice describes the tasks and duties that a VA health care professional practicing in the health care profession may perform and may be permitted to undertake. Having a national standard of practice means that individuals from the same VA health care profession may provide the same type of tasks and duties regardless of the state where they are located or the state license, registration, certification, or other state requirement they hold. VA emphasized in the rulemaking and reiterates here that VA will determine, on an individual basis, that a health care professional has the proper education, training, and skills to perform the tasks and duties detailed in the national standard of practice and that they will only be able to perform such tasks and duties after they have been incorporated into the individual's privileges, scope of practice, or functional statement. The rulemaking explicitly did not create any such national standards and directed that all national standards of practice would be subsequently created via policy.

As authorized by 38 CFR 17.419, VA is developing national standards of practice via policy. There is one overarching directive to describe Veterans Health Administration (VHA) policy on national standards of practice. The directive is accessible on the VHA Publications website at <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external). As each individual national standard of practice is finalized, it is published as an appendix to the directive and accessible at the same websites.

## Purpose

It is critical that VA, the Nation's largest integrated health care system, develops national standards of practice to ensure first, that beneficiaries receive the same high-quality care regardless of where they enter the system and, second, that VA health care professionals can efficiently meet the needs of beneficiaries when practicing within the scope of their VA employment. National standards are designed to increase beneficiaries' access to safe and effective health care, thereby improving health outcomes.

The importance of this initiative has been underscored by the coronavirus disease 2019 (COVID-19) pandemic. The increased need for mobility in VA's workforce, including through

VA's Disaster Emergency Medical Personnel System, highlighted the importance of creating uniform national standards of practice to better support VA health care professionals who practice across state lines. As a national health care organization, VA often has health care professionals primarily based out of a VA medical center in one state travel to smaller community-based outpatient clinics in neighboring states to ensure access to care for Veterans.

Creating national standards of practice also promotes interoperability of medical data between VA and the Department of Defense (DoD), providing a complete picture of a Veteran's health information and improving VA's delivery of health care to the Nation's Veterans. DoD has historically standardized practice for certain health care professionals, and VA has closely partnered with DoD to learn from their experience.

It is also imperative that VA, as a national health care system, can recruit and retain health care professionals, to ensure there is access to health care regardless of where the Veteran resides. VA needs the flexibility to hire qualified health care professionals from any state to meet the staffing needs of a VA medical facility where recruitment or retention is difficult. This flexibility is especially beneficial in recruiting spouses of active service members who frequently move across the country and can be subject to delays in starting new employment due to needing to obtain an additional state requirement to practice in the new state.

### Development Process

To develop VA's national standards of practice, VA is using a robust, interactive process that adheres to the guidelines outlined in Executive Order (EO) 13132 to preempt conflicting state laws, rules, regulations, or other requirements. All standards undergo a deliberate review process, both within VA and externally, to ensure that the draft national standard is consistent with VA's team-based approach to care, results in the highest quality of care for Veterans, is implementable on an enterprise level, and is legally supportable. The process includes consultation with internal and external stakeholders, including state licensing boards, VA employees, professional associations, Veterans Service Organizations, labor partners, and others.

For each VA occupation, a workgroup comprised of health care professionals in the identified occupation conducts research to identify internal best practices that may not be authorized under every state license, certification, or registration, but would enhance the practice and efficiency of the profession throughout VA. If a best practice is identified that is not currently authorized by every state, the workgroup determines what education, training, and skills are required to perform such task or duty. The workgroup then drafts a proposed VA national standard of practice using the data gathered during the research and incorporates internal stakeholder feedback into the standard. The workgroup may consult with internal or external stakeholders at any point throughout the process.

The proposed national standard of practice is internally reviewed, to include by an interdisciplinary workgroup consisting of representatives from Quality Management; VA medical facility Chief of Staff; Academic Affiliates; Veterans Integrated Services Network (VISN) Chief Nursing Officer; Ethics; Workforce Management and Consulting; Surgery; Credentialing and Privileging; VISN Chief Medical Officer; and Electronic Health Record Modernization.

VA has developed a robust process to engage with partners, members of the public, states, and employees on the proposed national standard of practice. In addition, the proposed national standard of practice is provided to our partners in DoD as a notification and opportunity to flag inconsistencies with DoD standards. VA provides the proposed national standard of practice to our DoD partners as an opportunity to flag inconsistencies with DoD standards. VA also engages with labor partners informally as part of a pre-decisional collaboration. Consistent with EO 13132, VA sends a letter to each state board and certifying organization or registration organization, as appropriate, which includes the proposed national standard and offers the recipient an opportunity to discuss the national standard with VA. After the state boards, certifying organizations, or registration organizations have received notification, the proposed national standard of practice is posted in the Federal Register for 60 days to obtain feedback from the public, professional associations, and any other interested parties. At the same time, the proposed national standard is posted to an internal VA site to obtain feedback from VA employees. Responses received through all vehicles—from state boards, professional associations, unions, VA employees, and any other individual or organization who provides comments via the Federal Register—will be reviewed. VA will make appropriate revisions in light of the comments, including those that present evidence-based practice and alternatives that help VA meet our mission and goals. VA may also make additional changes outside the scope of the comments during its own internal review processes after the conclusion of the comment period. This document provides a summary of the comments received and VA's response to the comments.

## VA Recreation Therapist: Feedback on National Standard

VA Recreation Therapists systematically use recreation and therapeutic interventions for the specific purpose of improving the physical, social, emotional, cognitive, and spiritual functioning of individuals; enhancing well-being; and enabling greater quality of life through recreation participation for individuals with injury, illness, or disability. VA employs approximately 985 Recreation Therapists in the United States.

On July 28, 2023, VA posted the proposed national standard of practice for Recreation Therapists in the Federal Register, 88 FR 48963 (<https://www.federalregister.gov/documents/2023/07/28/2023-16007/notice-of-request-for-information-on-the-department-of-veterans-affairs-recreation-therapists>) and within VA's intranet for public and employee feedback, respectively. The proposed national standard of practice remained open for comment for 60 days, through September 26, 2023. A copy of the national standard of practice for Recreation Therapists that was posted for feedback is located in [Appendix A](#).

The Under Secretary for Health also sent letters to the five state licensing boards for Recreation Therapists, the American Therapeutic Recreation Association, and the National Council for Therapeutic Recreation Certification to inform them of VA's intent to follow the American Therapeutic Recreation Association standards and provide them with an opportunity to provide feedback directly to VA. Although the National Council for Therapeutic Recreation Certification is the certification body for Recreation Therapists, the American Therapeutic Recreation

Association has developed the Standards for the Practice of Recreational Therapy. Copies of the letters are located in [Appendix B](#).

VA specifically sought feedback through the following questions:

1. *Are there any required trainings for the aforementioned practices that we should consider?*
2. *Are there any factors that would inhibit or delay the implementation of the aforementioned practices for VA health care professionals in any state?*
3. *Is there any variance in practice that we have not listed?*
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?*
5. *Is there anything else you would like to share with us about these national standards of practice?*

In addition to leaving specific comments and suggestions, commenters internal to VA could choose to provide agreement or disagreement on the proposed national standard. Agreement denotes overall acceptance of the standard while disagreement denotes that the national standard in its original form presents significant clinical, legal, or patient safety concerns. Employees could also select not applicable if the national standard did not pertain to their area of expertise.

In response to the proposed national standard of practice for Recreation Therapists, VA received two comments from individuals from the public through the Federal Register. VA received two responses from state licensing boards for Recreation Therapists, one comment from the American Therapeutic Recreation Association, and one comment from the National Council for Therapeutic Recreation Certification. Through an internal VA site, VA received 75 comments from VA employees. Out of the 75 employee comments, 58 employees *agreed*, and 17 employees selected *not applicable*.<sup>1</sup>

### Certification Body Feedback

On July 28, 2023, VA sent a letter to the certification body to inform them of VA's intent to follow the American Therapeutic Recreation Association standards for the national standard of practice for Recreation Therapists and provided them with an opportunity to discuss the proposed national standard of practice with VA. A copy of the letter sent to the National Council for Therapeutic Recreation Certification from the Under Secretary for Health is located in [Appendix B](#).

Comment: The National Council for Therapeutic Recreation Certification provided feedback on VA's proposed standard for Recreation Therapists. They requested the registered trademark symbol be used with Certified Therapeutic Recreation Specialist®, CTRS®, National Council for Therapeutic Recreation Certification®, and NCTRC® the first time those words or acronyms appear in the national standard of practice for Recreation Therapists.

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<sup>1</sup> At the time of feedback, employees were prompted to select "concur," "concur with comments," and "non-concur."

The National Council for Therapeutic Recreation Certification pointed out that they did not create the Standards of Practice from the American Therapeutic Recreation Association but did establish their own Certification Standards. The National Council for Therapeutic Recreation Certification requested a statement acknowledging the Certification Standards and a link to the website containing those standards be added to the national standard of practice.

They also stated that California and North Carolina do not recognize the professional experience requirement for those who use the Equivalency Path to Certified Therapeutic Recreation Specialist certification. Both states require an internship, which could be problematic for individuals who prefer the Equivalency Path to earn their Certified Therapeutic Recreation Specialist credential.

Response: The national standard of practice for Recreation Therapists does not use the terms Certified Therapeutic Recreation Specialist, CTRS, National Council for Therapeutic Recreation Certification, or NCTRC, and therefore, VA considers adding them outside the scope of this initiative and will not incorporate them into the national standard of practice.

The National Council for Therapeutic Recreation Certification's standards are the policies and procedures for the credentialing process. VA believes the American Therapeutic Recreation Association Standards of Practice are a more thorough and accurate reflection of the provision of recreation therapy services. In addition, VA has Recreation Therapists who may not have the Certified Therapeutic Recreation Specialist certification from the National Council for Therapeutic Recreation Certification because they were grandfathered into their positions. VA Handbook 5005, Staffing, Part II, Appendix G60 includes a grandfathering provision for employees who, on the effective date of the qualification standard (June 7, 2019), were considered to have met all qualification requirements for the title, series, and grade held, including education and certification that are part of the basic requirements of the occupation of Recreation Therapist. As stated in VHA Directive 1900, VA National Standards of Practice, all national standards apply to employees grandfathered into their respective positions unless otherwise noted in the national standard of practice. Therefore, the Recreation Therapist national standard of practice will require VA Recreation Therapists to practice according to the American Therapeutic Recreation Association Standards of Practice.

The recognition status of the professional experience requirement for those who use the Equivalency Path to Certified Therapeutic Recreation Specialist certification does not impact the Recreation Therapist national standard of practice.

### State Licensing Board Feedback

On July 28, 2023, VA sent letters to the five state licensing boards for Recreation Therapists with the proposed national standard of practice and provided them with an opportunity to discuss the proposed national standard of practice with VA. Of the five state licensing boards, one offers an exemption for employees working at Federal facilities. VA received comments from two of the five state licensing boards for Recreation Therapists. Copies of the letters sent to the state licensing boards from the Under Secretary for Health are located in [Appendix B](#).



Comment: The New Jersey Board of Creative Arts and Activities Therapies informed VA that the rules for Recreation Therapy licenses in New Jersey are currently being promulgated, and the state is not able to license Recreation Therapists at this time.

Response: In response to the New Jersey Board of Creative Arts and Activities Therapies' feedback, VA revised the national standard of practice for Recreation Therapists to include a note that pursuant to New Jersey 45:8B-108, beginning on July 19, 2020, New Jersey must issue state licenses for Recreation Therapists practicing recreation therapy in New Jersey. As of December 20, 2023, New Jersey has not determined a date of issuance for recreation therapy licenses. VA will remain in close contact with the New Jersey Board of Creative Arts and Activities Therapies to keep informed of licensure updates.

Comment: The North Carolina Board of Recreational Therapy Licensure pointed out North Carolina students performing an internship as part of their educational requirements must do so under the supervision of a licensed Recreation Therapist if the internship is conducted in North Carolina. Students seeking to perform internships at VA facilities need to be aware of their internship supervisor's credentials.

Response: The national standard of practice for Recreation Therapists does not apply to students and trainees; it applies only to licensed, certified Recreation Therapists.

### Professional Association Feedback

On July 28, 2023, VA sent a letter to the American Therapeutic Recreation Association with the proposed national standard of practice and provided them with an opportunity to discuss the proposed national standard of practice with VA. A copy of the letter sent to the American Therapeutic Recreation Association from the Under Secretary for Health is located in [Appendix B](#).

Comment: The American Therapeutic Recreation Association recommended removing the following language from the first paragraph of the proposed national standard of practice: “. . . promote the development and maintenance of a healthy leisure lifestyle and increase independent participation in activities of choice through activity modification, adaptation and facilitation.” The American Therapeutic Recreation Association believes this phrase shifts the focus of Recreational Therapist services away from functional outcomes toward the idea of a leisure lifestyle. Language from the Centers of Medicaid and Medicare Services emphasizes “active treatment.”

The American Therapeutic Recreation Association recommended VA use its definition of recreational therapy: “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.” They explained that this language mirrors language supported by Centers of Medicaid and Medicare Services for acceptable services.

The American Therapeutic Recreation Association expressed concern that not all VA Recreation Therapists follow their Standards of Practice, and strongly recommended all VA Recreation Therapists purchase a copy of the American Therapeutic Recreation Association Standards of Practice, use the Self-Assessment Guide in the Standards of Practice, and participate in an American Therapeutic Recreation Association training on the use of both the Standards of Practice and the Self-Assessment Guide. In addition, the American Therapeutic Recreation Association recommended that all VA Recreation Therapists complete the American Therapeutic Recreation Association Quality Internship Supervisor Training.

The American Therapeutic Recreation Association urged VA to add language recommending VA Recreation Therapists obtain state licensure where applicable.

Response: VA revised the first paragraph of the national standard of practice for Recreation Therapists to include functional outcomes as suggested by the American Therapeutic Recreation Association. VA changed “activity-based” to “therapeutic” in the first sentence. In the second sentence, VA changed “functional abilities” to “functional outcomes,” removed “and maintenance,” and changed “independent participation” to “independence.”

The national standard of practice for Recreation Therapist defines the role of a VA Recreation Therapist; not the practice of recreation therapy itself. Therefore, VA will neither change its definition of Recreation Therapist nor add a definition for recreation therapy in the national standard of practice.

In the national standard of practice for Recreation Therapist, VA identified that all VA Recreation Therapists follow and will continue to follow the American Therapeutic Recreation Association Standards of Practice. VA will continue to educate and train Recreation Therapists as necessary.

VA does not require its Recreation Therapists be licensed in a state. VA only requires Recreation Therapists to be certified in recreation therapy as a Certified Therapeutic Recreation Specialist by the National Council for Therapeutic Recreation Certification. Currently, five states license Recreation Therapists: New Hampshire, New Jersey, North Carolina, Oklahoma, and Utah. Of those, Oklahoma exempts Federal employees from its state licensure requirements. It is at the employee’s discretion to choose whether to obtain and maintain their state license.

### Feedback Across Five Areas

All commenters had the opportunity to provide responses to the five areas on which VA solicited feedback, and VA responds to any questions or concerns raised by the commenters in response to those areas below.

VA received comments from employees and individuals from the public that

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*“I concur with needing a National Standard of Practice for VA Recreation Therapists that is not encumbered by individual state standards.”–  
Comment from VA employee*

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were supportive of the draft national standard of practice, as well as comments that were not responsive to the specific national standard of practice.

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

Comment: An employee suggested the Aquatic Therapy and Rehab Institute certification for aquatic therapy practice. They also commented that Whole Health requires 200 hours of yoga training approved by Yoga Alliance to facilitate yoga. Another employee mentioned additional trainings beyond the minimum requirement from the National Council for Therapeutic Recreation Certification. Employees also mentioned required continuing education units from the American Therapeutic Recreation Association.

Response: The national standards of practice do not address optional trainings. VA qualification standards, located in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019, set the minimum training and certification requirements for VA Recreation Therapists. VA ensures all Recreation Therapists have the appropriate education and training to perform their job duties. Specialized trainings are supplementary and optional for VA Recreation Therapists who are interested in advancing their skills. VA requires individuals to be Certified Yoga Therapists to facilitate yoga, regardless of clinical background. However, this is not a mandatory skill for Recreation Therapists.

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

Comment: One employee asked whether VA Recreation Therapists in states that require licensure would need to hold both licensure and certification to work at VA. In addition, they asked if VA would consider reciprocity for those who hold a license in another state or will require a license in the state of practice. Several employees asked whether employees practicing in states that require licensure would have a grace period to obtain licensure.

Response: The national standard of practice for Recreation Therapist will not change the qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019. The qualification standards require VA Recreation Therapists to be certified in recreation therapy as a Certified Therapeutic Recreation Specialist by the National Council for Therapeutic Recreation Certification. VA does not require its Recreation Therapists to obtain a license to practice recreation therapy at VA. Currently, five states license Recreation Therapists: New Hampshire, New Jersey, North Carolina, Oklahoma, and Utah. Of those, Oklahoma exempts Federal employees from its state license requirements. Since VA only requires certification, it is at the employee's discretion to choose whether to obtain and maintain their state license.

On November 12, 2020, VA published an interim final rule 85 FR 71838 (<https://www.federalregister.gov/documents/2020/11/12/2020-24817/authority-of-va-professionals-to-practice-health-care>) confirming that VA health care professionals may practice their health care profession consistent with the scope and requirements of their VA employment, notwithstanding any state license, registration, certification, or other state requirements that unduly interfere with their practice. This rulemaking confirmed VA's practice of allowing VA

health care professionals to deliver health care services in a state other than the health care professional's state of licensure, registration, certification, or other state requirement. The interim final rule applies to all VA health care professionals, including Recreation Therapists.

Comments: Employees asked what the Recreation Therapist national standard of practice will mean for employees who were hired into the position prior to the current VA qualification standards as of June 7, 2019 (known as being “grandfathered”).

Response: As stated in VHA Directive 1900, VA National Standards of Practice, all national standards of practice apply to employees grandfathered into their respective positions unless otherwise noted in the national standard. The Recreation Therapist qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019, include a grandfathering provision for employees who, on the effective date of the qualification standard, were considered to have met all qualification requirements for the title, series, and grade held, including education and registration that are part of the basic requirements of the occupation. The qualification standards are not changing due to the implementation of the national standard of practice.

Comment: One employee asked whether a GS-9 level Recreation Therapist needs to be certified.

Response: VA Recreation Therapists must meet the qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G60, dated June 7, 2019, which requires certification in recreation therapy as a Certified Therapeutic Recreation Specialist by the National Council for Therapeutic Recreation Certification. The qualification standard provides an exception of this certification requirement for Recreation Therapists at the GS-7 and GS-9 level. Non-certified applicants, who otherwise meet the eligibility requirements for certification, may be given a temporary appointment as a graduate Recreation Therapist for a period not to exceed two years. In all cases, Recreation Therapists must actively pursue completing certification requirements, starting from the date of appointment. Failure to become certified as a Recreation Therapist within two years from the date of appointment will result in removal from the occupation of Recreation Therapist and may result in termination of employment.

Comment: An employee asked how VA would address someone choosing to let their certification expire while working as a Recreation Therapist within VA.

Response: The qualification standards in VA Handbook 5005, Staffing, Part II, Appendix G60, date June 7, 2019, require VA Recreation Therapists to maintain their certification or else be removed from the occupation, which may result in termination of employment. The qualification standards are not changing as a result of the national standard of practice.

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

Comment: One employee commented that the Recreation Therapists national standard of practice should include appropriate traditional American Indian/Alaska Native recreation modalities (e.g., equine therapy, stick games, specific ceremonies, etc.).

Response: The national standard of practice for Recreation Therapist does not include an exhaustive list of every task and duty that each VA health care professional can perform. Rather, it is designed to highlight whether there are any areas of variance in how Recreation Therapists can practice across states and how this profession will be able to practice within VA notwithstanding their state license, certification, and other requirements.

Comment: An employee asked whether Recreation Assistants would also have a national standard of practice to follow since some states, like North Carolina, require a license.

Response: Currently, VA is not developing a national standard of practice for Recreation Assistants. The national standard of practice for Recreation Therapists only applies to Recreation Therapists.

*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?*

Comment: An employee commented that VA needs consistent policy for all new hires. They stated that all certified Recreation Therapists should be supervised by the Recreation Therapy Supervisor/Director/Manager; no exceptions should be allowed.

Response: The national standards of practice do not determine supervision requirements for health care professionals. Not all VA Recreation Therapists are supervised by a Recreation Therapy Supervisor, Director, or Manager. Facilities determine supervision alignment at the local level based on staffing at that facility.

Comment: One employee asked if those staff who are licensed and supervising other staff would receive any type of incentive for this additional work, as it would be the same as supervising an intern and co-signing all their work.

Response: The national standard of practice for Recreation Therapist is not creating additional supervision requirements for VA Recreation Therapists.

Comment: An employee recommended VA carefully review requirements established by the respective state, taking into consideration the course work, field experience, internships, residencies, and state examinations if required. Another employee also asked VA to consider any possible financial barriers when preempting conflicting state laws, regulations, or requirements regarding supervision of individuals working toward obtaining their license or unlicensed personnel.

Response: VA conducted research on each state to review requirements prior to drafting the proposed national standard of practice for Recreation Therapist. In addition, VA sent letters to each state licensing board for Recreation Therapists and asked for feedback on the proposed national standard of practice. VA will continue to maintain communication with state licensing boards throughout implementation of the national standard of practice. By not requiring state licenses, VA will, if anything, lower financial barriers of entry to the field while maintaining rigorous safety standards.

*5. Is there anything else you would like to share with us about these national standards of practice?*

Comment: An employee suggested it would be helpful to see a full presentation on what the national standard of practice means for current employees, particularly those practicing in states that require licensure.

Response: Once the national standard of practice is finalized and published, the VA Recreation Therapy and Creative Arts Therapy Service program office will begin implementation of the national standard, which will include communication to all employees.

Comment: Two employees commented that VA Recreation Therapists should follow the Certification Standards from the National Council for Therapeutic Recreation Certification, not the American Therapeutic Recreation Association Standards for the Practice of Recreational Therapy, since the National Council for Therapeutic Recreation Certification is the certification body for Recreation Therapists.

Response: The National Council for Therapeutic Recreation Certification's standards are the policies and procedures for the credentialing process. VA believes the American Therapeutic Recreation Association Standards of Practice are a more thorough and accurate reflection of the provision of recreation therapy services. In addition, VA has Recreation Therapists who may not have the Certified Therapeutic Recreation Specialist certification from the National Council for Therapeutic Recreation Certification because they were grandfathered into their positions. VA Handbook 5005, Staffing, Part II, Appendix G60 includes a grandfathering provision for employees who, on the effective date of the qualification standard (June 7, 2019), were considered to have met all qualification requirements for the title, series, and grade held, including education and certification that are part of the basic requirements of the occupation of Recreation Therapist. As stated in VHA Directive 1900, VA National Standards of Practice, all national standards apply to employees grandfathered into their respective positions unless otherwise noted in the national standard of practice. Therefore, the Recreation Therapist national standard of practice will require VA Recreation Therapists to practice according to the American Therapeutic Recreation Association Standards of Practice.

Comment: An employee suggested using different language in the first paragraph of the national standard of practice by changing "activity-based" to "therapeutic."

Response: VA revised the national standard of practice to change "activity-based" to "therapeutic."

Comment: An individual from the public commented via the Federal Register that both the National Council for Therapeutic Recreation Certification and the American Therapeutic Recreation Association have the highest standards and certifications for Recreation Therapists and therefore, VA Recreation Therapists should be exempt from state regulations if they are following standards from these organizations.

Response: VA only requires Recreation Therapists to be certified in recreation therapy as a Certified Therapeutic Recreation Specialist by the National Council for Therapeutic Recreation Certification.

Comment: An individual from the public commented via the Federal Register that the American Psychology Association needs to be involved with practices, recommendations, licensing, and reporting.

Response: This national standard of practice only applies to VA Recreation Therapists. VA Recreation Therapists must be certified in recreation therapy as a Certified Therapeutic Recreation Specialist by the National Council for Therapeutic Recreation Certification. VA Psychologists will follow their own, separate national standard of practice.

## Conclusion

VA considered all comments that it received. VA is making six changes to the Recreation Therapist National Standard of Practice based on the reasons described above. VA revised the national standard of practice to include functional outcomes as suggested by the American Therapeutic Recreation Association. VA changed “activity-based” to “therapeutic” in the first sentence. VA changed “functional abilities” to “functional outcomes,” removed “and maintenance”, and changed “independent participation” to “independence” in the second sentence. VA also added a note to the national standard of practice to clarify that pursuant to New Jersey 45:8B-108, beginning on July 19, 2020, New Jersey must issue state licenses for Recreation Therapists practicing recreation therapy in New Jersey. As of December 20, 2023, New Jersey has not determined a date of issuance for recreation therapy licenses. Last, VA updated the date of when VA reviewed license and certification requirements for this occupation to December 2023.

The final VA national standard of practice for Recreation Therapists will be an appendix to VHA Directive 1900, VA National Standards of Practice and accessible on VHA Publications website at <https://vawww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external) once published. In accordance with VHA’s national policy process, the national standard of practice for Recreation Therapists will be reviewed and recertified at minimum on a five-year cycle.

## Appendix A: Draft National Standard of Practice for Recreation Therapists








Appendix A includes the proposed national standard of practice for Recreation Therapists posted in the Federal Register and within VA on July 28, 2023, for individuals to provide feedback on. The final national standard of practice for Recreation Therapists is written into VHA Directive 1900, VA National Standards of Practice, published at <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external).

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.
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.
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.
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.



## Appendix B: VA Under Secretary for Health Letters

Letter	Organization	Responded to VA as of June 2024*
 Letter from Department of Veterans Affairs	American Therapeutic Recreation Association	Yes
 Letter from Dept of Veterans Affairs to N	National Council for Therapeutic Recreation Association	Yes
 Letter from Department of Veterans Affairs	New Hampshire Office of Professional Licensure & Certification	No
 Letter from Department of Veterans Affairs	New Jersey Board of Creative Arts and Activities Therapies	Yes
 Letter from Department of Veterans Affairs	North Carolina Board of Recreational Therapy Licensure	Yes
 Letter from Department of Veterans Affairs	Oklahoma Therapeutic Recreation Committee	No
 Letter from Department of Veterans Affairs	Utah Recreation Therapy Licensing Board	No

**\*VA reviewed all comments received and made appropriate revisions to the VA standard of practice for Recreation Therapists in light of the comments, to include those that help VA meet its mission and goals through evidence-based practice and alternatives. This final report is a collective response to all comments; however, VA will continue to actively engage with states.**