

Via e-mail
Via First-class mail

June 14, 2012

Lynn Medley
U.S. Department of Education
400 Maryland Avenue, SW
Room 5140, Potomac Center Plaza
Washington, DC 20202-2700

Re: NIDRR's Long Range Plan for Fiscal Years 2013-2017

Dear Ms. Medley,

The **American Occupational Therapy Association (AOTA)** represents over 140,000 occupational therapists, occupational therapy assistants and students of occupational therapy. We appreciate this opportunity to comment on NIDRR's proposed Long Range Plan (LRP) for Fiscal Years 2013-2017, per notice in the Federal Register on April 18, 2012.

Comments on I. Introduction

AOTA agrees with NIDRR's proposal to establish and actively solicit the guidance of the broadly based **Rehabilitation Research Advisory Council (RRAC)**. Although the plan did not specifically the members of the RRAC, we hope that NIDRR will appoint stakeholders such as consumers, disability advocates, researchers, professional associations, and clinicians to form an interdisciplinary advisory group.

Comments on III. Background

AOTA is pleased that NIDRR has affirmed its commitment to maintaining its emphasis on practical applications of research, development, knowledge translation, capacity building, technical assistance, and information dissemination to improve the lives and quality of living for individuals with disabilities. As a service provider to many individuals with disabilities, AOTA shares many of NIDRR's goals. For example, from our systematic reviews, we realize that we need more rigorous well-designed research to examine the **efficacy** of many habilitative and rehabilitative interventions. To meet this need, we need to increase the **research capacity** in many disability-related fields, including **occupational therapy**.

AOTA appreciates the RERCs' focus on the **cost-effective** delivery and use of assistive technology devices. In the current health care's fiscal environment, it could be

advantageous to extend the cost-effectiveness question to other rehabilitative services perhaps via a published priority for field-initiated projects or within the “Stages of Research Framework” (i.e., the Scale-Up Evaluation) so that policy-makers would have additional data to inform their decisions.

Comments on **IV. Proposed Goals and Objectives**

Objective 1.1

AOTA agrees with NIDRR’s proposal to establish a balanced distribution of priorities focused on improved outcomes in the areas of Employment, Community Living and Participation, and Health and Function.

Certainly, **Employment** should continue to be an important goal and outcome for NIDRR. AOTA hopes that **driving and transportation** is considered within this domain for future research because it can be a critical variable for successful and sustained employment. Occupational therapy practitioners can evaluate an individual's skills and ability to operate a vehicle safely and provide training for accessing alternative methods of transportation. Additionally, there is a growing need to address older drivers with disabilities as well as younger drivers with developmental disabilities (e.g., autism spectrum disorder).

Within the domain of **Community Living and Participation**, we appreciate the inclusion of **environmental modifications** and person-centered therapeutic interventions. As the number of elderly individuals increases significantly in the near future, the desire to Age in Place requires evidence for **home modifications** and safety. Occupational therapy practitioners help people with disabilities in the home through training on the use of assistive technologies, improving self-care, providing mobility evaluations, designing and implementing home modifications and by developing plans for safety, independence and function within the home environment.

Another area deserving of additional focus is **transitioning** students with special education needs from school into the workforce and roles of adult life. Occupational therapists are currently working with students under IDEA to facilitate more successful employment and participation outcomes, but states and specific school systems vary widely with regard to transitioning programs. Research is needed on best practices, models, and cost-benefit analyses to improve practices and outcomes in order to demonstrate the true effectiveness of transition efforts to attain the outcomes of sustained employment and independent living.

Objective 1.2

AOTA agrees with the need to continue **Rehabilitation Research and Training Centers** (RRTCs) and lauds the effort to address rehabilitation of individuals from underrepresented backgrounds.

With regard to the **Rehabilitation Engineering and Research Centers (RERCs)**, AOTA questions whether the priority “Information and Communication Technologies” should be expanded to “Information and Assistive Technologies” to incorporate a broader view of the multiple uses of technology. With many of the current technologies, devices can be used for communication as well as for other health-related purposes such as monitoring activity level, preventing secondary conditions, ensuring accurate medication management, etc.

Objective 1.3

AOTA approves of NIDRR’s proposal to increase the number of **field-initiated opportunities** for research and development opportunities to support innovation.

Comments on Objective 2.1

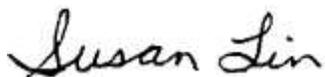
AOTA recognizes the benefits of NIDRR’s proposed **Stages-of-Research Framework** and supports its use in the application process. Using the framework could facilitate reflection and logical planning of research questions and programs. We are particularly pleased that the Scale-Up Evaluation includes “well-designed studies of interventions that have been widely adopted in practice, but lack a sufficient evidence-base on its effectiveness”, since this applies to many rehabilitative interventions. AOTA hopes that cost-effectiveness or utilization of habilitative/rehabilitative services including technologies will be considered within this portion of the framework.

Comments on Objective 4.1 and 4.2

NIDRR’s plan to **streamline processes** for establishing and publishing priorities for grant competitions is most welcome and timely. Likewise, having a regular schedule of competitions and peer reviews will be extremely helpful to grant applicants and reviewers.

AOTA appreciates this opportunity to comment on NIDRR’s Long-Range Plan for Fiscal Years 2013-2017. We commend NIDRR’s leaders and staff for considering our comments and questions. We look forward to working with you to improve the daily lives of people with disabilities and their families.

Sincerely,



Susan H. Lin, ScD, OTR/L

Director of Research
American Occupational Therapy Association