



**Workforce and Employment Committee Letter to DHCS  
Re: HCBA Amendment Public Comment**

September 9, 2019

Department of Health Care Services  
Integrated Systems of Care Division, MS 4502  
P.O. Box 997437  
Sacramento, CA 95899 7437  
**Attention:** HCBS Section

CHAIRPERSON  
Lorraine Flores

EXECUTIVE OFFICER  
Jane Adcock

**RE: HCBA Amendment Public Comment**

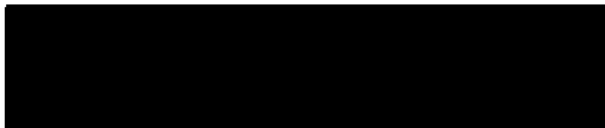
In response to the opportunity for public comment regarding the HCBA waiver amendment, the California Behavioral Health Planning Council (Council) writes to recommend that Occupational Therapists (OTs) be considered "licensed persons" for the purposes of this waiver.

Occupational Therapists play a valuable role in providing community-based services. Practitioners of occupational therapy are educated to provide services that support mental and physical health and wellness, rehabilitation, habilitation, and recovery-oriented approaches. In the State of California, Occupational Therapists are licensed by the California Board of Occupational Therapy, and as a result are independent and autonomous providers. Furthermore, the Council is acutely aware of a growing behavioral health workforce shortage, which presents serious barriers to the access of services. In the United States, only **1-3%** of Occupational Therapists work in identified mental health treatment settings. This is in stark contrast to the rest of the world, where approximately **50%** of OTs work in mental health services. The Council believes that excluding OTs from the lists of "licensed persons" in the HCBA waiver exacerbates this problem by unnecessarily limiting the work that OTs are permitted to do.

It is for these reasons that the Council strongly recommends that DHCS specifically name Occupational Therapists as "licensed persons" in the waiver amendment, including for the purposes of providing waiver services and case management services.

If you have any questions, please contact Jane Adcock, Executive Officer, at (916) 322-3807 or [Jane.Adcock@cbhpc.dhcs.ca.gov](mailto:Jane.Adcock@cbhpc.dhcs.ca.gov).

Sincerely,



Lorraine Flores  
Chairperson

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- Evaluation
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