



OFFICE OF THE UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-4000

**PERSONNEL AND
READINESS**

The Honorable James M. Inhofe
Chairman
Committee on Armed Services
United States Senate
Washington, DC 20510

SEP 17 2018

Dear Mr. Chairman:

The enclosed report is in response to House Report 115-200, page 146, accompanying H.R. 2810, the National Defense Authorization Act for Fiscal Year 2018, which requests the Secretary of Defense to provide a report on improving access to para health professional extenders.

The enclosed report outlines how “para health professional extenders” (listed as “paraprofessionals”) are used throughout each of the Military Departments, and decides the duties and responsibilities of each of the 13 paraprofessional occupations employed in DoD. The report describes the common processes that are in place for hiring and reimbursing military, civilian, and contractor para health professionals across the Military Health System (MHS). The report also discusses the annual and out-year manpower reviews that are conducted, which include a determination as to whether current paraprofessional staff levels are correct. This process allows the Departments to respond to emerging and/or new requirements. In addition, this report addresses various occupations, including mental health providers, physical therapists, and occupational therapists, and describes how they are differentiated from paraprofessionals. Finally, the report provides the number of military, civilian, and contractor paraprofessional employees, by occupation, in the MHS.

Thank you for your interest in the health and well-being of our Service members. A similar letter is being sent to the Chairman of the House Committee on Armed Services.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephanie Barna".

Stephanie Barna
Performing the Duties of the Under Secretary of
Defense for Personnel and Readiness

Enclosure:
As stated

cc:
The Honorable Jack Reed
Ranking Member



PERSONNEL AND
READINESS

OFFICE OF THE UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-4000

SEP 17 2018

The Honorable William M. "Mac" Thornberry
Chairman
Committee on Armed Services
U.S. House of Representatives
Washington, DC 20515

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Stephanie Barna
Performing the Duties of the Under Secretary of
Defense for Personnel and Readiness

Enclosure:
As stated

cc:
The Honorable Adam Smith
Ranking Member

**Report to Congressional Armed Services Committees
House Report 115–200, Page 146, Accompanying
H.R. 2810, the National Defense Authorization Act
for Fiscal Year 2018**



**Report on Improving Access to Para Health
Professional Extenders**

The estimated cost of this report for the Department of Defense (DoD) is approximately \$7,320 in Fiscal Years 2017 - 2018. This includes \$0 in expenses and \$7,320 in DoD labor.

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MILITARY HEALTH SYSTEM USE OF PARA HEALTH PROFESSIONAL EXTENDERS

This report is in response to House Report 115–200, page 146, accompanying the National Defense Authorization Act for Fiscal Year 2018, which requests the Secretary of Defense to report on “Improving Access to Para Health Professional Extenders.”¹ The full text of this request is in the Attachment to this response.

GROUND RULES: In order to be properly responsive to this request, and to ensure Department-wide consistency, we provided the Military Departments and the Defense Health Agency (DHA) with the following as basic “ground rules” for preparing their responses:

- For the purposes of this tasker, the working definition of “para health professional extenders” is: Paraprofessional: A person with education and training in a specific area of one of the professions (e.g., medicine or law) who provides services in that profession as an extension of an individual licensed to practice independently.
- The stated interest of the House Armed Services Committee is to gather information to demonstrate “. . .improve[d] beneficiary access to health care services. . .” For this reason, we ask that Services not count persons in the occupations listed in [the attachment] unless they are involved in direct patient care.

OCCUPATIONAL DEFINITIONS: We provided the Services with a list of the 13 paraprofessional occupations in the Military Health System (MHS). In addition to a general description of each occupation, we included an overview of the typical duties and responsibilities of each. Employees in these positions are all engaged in direct patient care and perform duties that are an extension of the healthcare professionals with whom they work and by whom they are supervised. At higher grades (GS-6 and above) paraprofessionals perform complex and difficult work, but work that does not require the level and extent of education and training that is required of healthcare professionals. Nevertheless, paraprofessional positions all require specialized experience and/or education and training; licensure by a State, territory, or the District of Columbia; and in some cases, certification by professional organizations, some of which require passage of rigorous examinations. This means that the care given by paraprofessionals is based on years of specialized experience, training, licensure, and appropriate professional supervision, thus ensuring the highest quality care is given to our beneficiaries.

COMMITTEE’S SPECIFIC INFORMATION REQUESTS AND RESPONSES:

1. “...the Committee is concerned that the Department does not have a common standard for hiring or reimbursing para health professionals.” “...outlining the process used by the Department to include para health professionals as healthcare providers within the MHS.”

There are common processes in place for hiring and reimbursing military, civilian, and contractor paraprofessionals across the MHS. (Please note that these processes and procedures are common to all MHS positions, not just to para healthcare professionals.)

¹ For the purposes of this report, we use the term “paraprofessionals” to refer to “Para Health Professional Extenders.”

MILITARY HEALTH SYSTEM USE OF PARA HEALTH PROFESSIONAL EXTENDERS

The Military Departments have staffing models that determine the numbers and skill levels that are required to perform the duties of jobs in the Military Treatment Facilities (MTFs).² Staffing models also determine the number of support staff required, such as paraprofessionals. As an example, Army's staffing support ratios are based on current professional associations' recommendations and practices in the civilian sector. The Military Departments indicate that their models are updated periodically to ensure that they stay current.

Once requirements are validated and authorized, the Military Departments fill the positions in accordance with existing rules and regulations.

- Military personnel are assigned based on the level of responsibility of the position, the member's occupational code or specialty, scope of service, and mission of the Department. Service Members are paid according to their military pay grade, the pay for which is determined by the annual Military Pay Scale for the U.S. Armed Forces.
- Civilian positions are classified using Office of Personnel Management (OPM) classification standards and are filled following OPM's recruitment and appointment authorities. The classification (title, series, and grade) determines the pay range of each civilian position. The Department also uses various title 38 compensation authorities, such as special salary rates, in order to offer more competitive salaries within local markets.
- Contract personnel responsibilities are specified in the statement of work that is included in the contract. Such personnel are hired based on the minimum qualifications and years of experience that are listed in the contract. Pay for contractors is determined by the salary that is listed in the Register of Wage Determinations under the Service Contract Act, governed by the Secretary of Labor.

2. "The Committee is also concerned with the delineated process that reviews the feasibility of using certain para health professionals or adding them to the list of individual professional providers of medical care who are authorized to provide services to TRICARE beneficiaries on an annual basis."

Responses from the Military Departments indicate that they conduct annual and out-year manpower reviews that include a determination as to whether current paraprofessional staff levels are correct. This process also allows the Departments to respond to emerging and/or new requirements. Examples include creating new civilian positions that MTF Commanders have indicated will provide better beneficiary healthcare, such as Art Therapists, Athletic Trainers, and Acupuncturists. The Air Force Surgeon General, for example, is evaluating out-year requirements and the feasibility of increasing civilian paraprofessional occupations in support of Integrated Operational Support missions.

² In accordance with Under Secretary of Defense memorandum to the Military Departments, dated May 22, 2018, "Construct for the Implementation of Section 702," the DHA will be responsible for developing, over time, a single Department of Defense process for determining medical and dental requirements across the Department.

**MILITARY HEALTH SYSTEM
USE OF PARA HEALTH PROFESSIONAL EXTENDERS**

3. “The review shall also determine the feasibility of incorporating physical therapist assistants, occupational health therapy and mental health counselors, and other para health professionals determined by the Secretary into the MHS to improve beneficiary access to health care services, while ensuring quality and outcome standards are maintained, supervision by appropriate health professionals, and reasonable reimbursement for services provided.”

We have included a chart that shows the numbers of military, civilian, and contractor personnel who are functioning as paraprofessionals in the MHS. The 48,700 military, civilian, and contractor personnel clearly reflect the robust use of paraprofessionals throughout the MHS. The occupations listed match with and complement many of the MHS professional healthcare providers. For instance, Psychology Technicians perform many duties in support of our professional Clinical and Counseling Psychologists, while Nursing Assistants and Licensed Practical Nurses (LPNs) provide a wide variety of support to the Nurses in our MTFs. It is important to reiterate that in addition to professional supervision and oversight, the levels of education, training, and experience across our paraprofessional workforce are extremely high, and meet the rigorous standards the MHS has established for patient care and safety.

Although we have provided data on paraprofessionals in the MHS, we have not included information on several of the occupations outlined in this request. Specifically:

- We did not provide information on our professional Physical Therapist and Occupational Therapist (PT/OT) positions, although we did provide data on the paraprofessionals that work with them. PT/OT numbers were not provided because these occupations are professional healthcare providers and require a graduate or higher-level degree from an accredited college or university, as well as completion of the clinical portion of the curriculum.
- We did not provide data on mental health counselors because these employees are professional health care providers, and not paraprofessionals. Our Clinical and Counseling Psychologists, for instance, must have a PhD from an accredited institution in order to be credentialed; our Licensed Clinical Social Workers, must have a Master’s degree and practicum to meet minimum qualifications for a GS-0185-09; and our Advanced Practice Psychiatric Nurses have advanced degrees, often at the PhD level.

**MILITARY HEALTH SYSTEM
USE OF PARA HEALTH PROFESSIONAL EXTENDERS**

MILITARY HEALTH SYSTEM PARA PROFESSIONALS BY OCCUPATION

Occupation	Military	Civilian	Contractor		TOTAL
Psychology Technician	1,555	272	48		1,875
Social Services Assistant	203	337	2		542
Licensed Practical Nurse	7,050	3,682	971		11,703
Nursing Assistant	2,596	828	313		3,737
Rehabilitation Assistant (Most are Physical Therapy Assistant and Occupational Therapy Assistant)	713	461	118		1,292
Health Technician (Most are Emergency Medical Technicians or work in support of a medical department such as Surgery, Urology, Audiology, etc.)	10,015	2,813	362		13,190
Nuclear Med Technician	247	66	24		337
Diagnostic Rad Tech	1606	801	199		2,606
Therapeutic Rad Tech	221	23	35		279
Medical Instrument Tech	1,165	562	97		1,824
Respiratory Therapist	639	237	110		986
Pharmacy Technician	1,769	1,403	445		3,617
Dental Assistant	4,187	1,653	876		6,716
GRAND TOTAL					48,704

**MILITARY HEALTH SYSTEM
USE OF PARA HEALTH PROFESSIONAL EXTENDERS**

OCCUATIONAL DEFINITIONS OF “PARAPROFESSIONALS” IN THE MHS

OPM has written qualification standards for all the civilian positions in this appendix. In all cases, qualification for a position requires “specialized experience” at the GS-4 level and above. This means that the applicant must demonstrate competencies that are directly related to the duties of the job being filled. Applicants can also qualify for these jobs by education alone (such as associate’s or baccalaureate degree in the appropriate discipline or specialty area) or by a combination of education and training. In most cases, the work described requires licensure and/or passage of a certifying examination.

GS-0181: Psychology Technicians: Performs nonprofessional technical work in connection with a providing direct services in psychology. Examples of the tasks a Psychology Technician might perform include triaging mental status evaluations for military beneficiaries, and, as a member of an interdisciplinary team, helping to determine mental, emotional, and or behavioral need for further treatment. Provides emergency crisis intervention counseling in person and telephonically as needed. Some Technicians serve as Psychometrists by administering and interpreting psychological tests and integrating the patient’s psychosocial history and behavior with the test results.

GS-0186: Social Science Assistants: Performs nonprofessional work in support of counseling, guidance, and related social services work, to include such work as conducting initial assessments and evaluating persons with emotional problems, and serving as a member of a multi-disciplinary team by assisting with various modalities of treatment, to include individual or group psychotherapy. Others may be engaged in developing discharge plans to include out-patient referrals and treatment plans after discharge.

GS-0620: LPNs: Performs a variety of nursing care tasks that do not require full professional nurse education but are represented by the licensing of practical and vocational nurses by a State, Territory, or the District of Columbia. Many LPNs work in direct support of one of the MTF medical departments, such as the surgical, urology, allergy/immunization, podiatry, anesthesia, medical message, optometry, ophthalmology, occupational health, audiology, chiropractic, or ENT departments. Employees in such positions perform a wide range of duties designed to relieve medical professionals of more routine, lower graded work. Duties might include preparing patient for procedures, carrying out routine procedures, taking and recording vital signs, administering medication and checking for reactions, drawing blood, preparing trays to be used in medical procedures, and collecting specimen.

GS-0621: Nursing Assistants: This series covers positions that involve a variety of personal care, nursing care, or related procedures that do not require: (1) the knowledge and skills represented by the licensure of practical and vocational nurses; or (2) fully professional nurse education. Typical duties include: taking and recording vital signs, taking height/weight measurements, and carrying out routine procedures such as taking throat cultures and changing bandages. Transports patients and prepares them for medical procedures. Such work is designed to relieve higher graded medical personnel of the more routine, lower graded work.

GS-0636: Rehabilitation Therapy Assistants: Treats, instructs, and/or works with patients in carrying out therapeutic activities prescribed for their physical or mental rehabilitation.

MILITARY HEALTH SYSTEM USE OF PARA HEALTH PROFESSIONAL EXTENDERS

Rehabilitation therapy assistants work in such fields of therapy as occupational, physical, corrective, manual arts, and educational. Assistants in this occupation often serve as a member of a multi-disciplinary team and participate in various activities designed to prevent, remediate, relieve, or rehabilitate a patient who suffers from chronic pain or pain associated with post-surgical procedures. Assistants assess functional abilities, demonstrate and assign therapies and/or exercises, assess progress, and adjust tasks as needed. Provides written and oral patient evaluations to health care professionals on the team.

GS-0640: Health Aid and Technicians: Performs nonprofessional work of a technical, specialized, or support nature in the field of health or medicine when the work is of such generalized, specialized or miscellaneous nature that there is no other more appropriate series. In the DoD, most of the employees in this series are either Industrial Hygiene Technicians, Emergency Medical Technicians/Paramedics, or they perform work in direct support of one of the MTF medical departments. Industrial Hygiene Technicians support the work of Industrial Hygienists by conducting surveys to evaluate existing potential health hazards and recommends solutions to problems. Work area surveys are to ensure compliance with established occupational safety and health regulations. Air samples are collected as determined by building Inspections or special projects. All data collected from surveys and/or air samples is entered into a database. Health Technicians work in support of medical departments such as the surgical, urology, allergy/immunization, podiatry, anesthesia, optometry, ophthalmology, occupational health, audiology, chiropractic, or ENT departments. Employees in department-specific positions perform such duties as preparing patient for procedures, carrying out routine procedures, and assisting healthcare professionals by carrying out the more routine repetitive work.

GS-0642: Nuclear Medical Technician: This series covers positions that involve using radionuclides for diagnostic, therapeutic, and investigative purposes. Such positions require a technical knowledge of the principles and practices of nuclear medicine and the ability to perform tests and examinations using radionuclides, radiation detectors, scanning apparatus, and related equipment in medical laboratories and clinics. Working with the patient, these technicians conduct complex diagnostic and therapeutic nuclear medicine tests and treatments. Tests are performed directly on patients ranging from children to adults of all ages.

GS-0647: Diagnostic Radiologic Technicians (DRTs): Performs or supervises technical work in the field of diagnostic radiologic examinations, performed under the direction of a physician. The work involves the operation of radiologic equipment in a hospital or clinic environment as part of the diagnostic plan for patients. DRTs' duties include conducting specialized radiologic equipment to include sonogram, mammogram, bone density, computed tomography (CT) scans, magnetic resonance imaging, and cardiovascular-interventional technology.

GS-0648: Therapeutic Radiologic Technicians: This series covers positions that involve supervision or performance of technical work that is subordinate to the work of radiotherapists or other professional or scientific personnel that involves the operation of ionizing radiation equipment and sealed radiation sources as part of a therapeutic treatment plan for patients. For instance, such an employee examines patients, conferring with the Radiation Oncologist as to specific requirements. Performs complex and intricate radiation treatments on patients using computerized Linear Accelerators. Performs simulations using a conventional simulator, as well as a CT based

MILITARY HEALTH SYSTEM USE OF PARA HEALTH PROFESSIONAL EXTENDERS

simulator. Reviews treatment plans and verifies that all treatment parameters and variables are properly recorded, and documents treatment sites with photos, diagrams, and tattoos. Administers contrast agents as needed.

GS-0649: Medical Instrument Technicians: This series covers positions that perform diagnostic examinations or medical treatment procedures as part of the diagnostic or treatment plan for patients. The work involves operating or monitoring diagnostic and therapeutic medical instruments and equipment associated with cardiac catheterization, pulmonary examinations and evaluations, heart bypass surgery, electrocardiography, electroencephalography, hemodialysis, and ultrasonography.

GS-0651: Respiratory Therapist: This series covers positions that involve the supervision or performance of technical work concerned with administering therapeutic and diagnostic respiratory care and life support to patients with cardiopulmonary deficiencies and abnormalities. The work involves: operating and monitoring respiratory equipment such as continuous and intermittent ventilators, medical gas delivery apparatus, incentive breathing/hyperinflation devices, environmental control systems, and aerosol devices; administering medical gases, humidification, aerosols, and respiratory medications; maintaining clearance of patient's natural and artificial airways; obtaining blood samples and interpreting blood gas data; and providing primary assistance in cardiopulmonary resuscitation.

GS-0661: Pharmacy Technicians: This series covers positions that involve technical support work in a pharmacy under the supervision of a registered pharmacist. The work requires application of a practical knowledge of: pharmaceutical nomenclature; characteristics, strengths, and dosage forms of pharmaceuticals; pharmaceutical systems of weights and measures; operation and care of pharmacy equipment; and pharmaceutical procedures and techniques. Typical duties include reviewing, preparing, and filling physician orders for prescriptions, intravenous solutions, inpatient unit dose orders, and bulk drug orders. These technicians also perform the final pharmacy check on sterile products, bulk drug orders, replenishment of emergency medication carts and inpatient unit dose medication carts issued to medication use areas within the facility. Such work relieves pharmacists of the more routine and repetitive work.

GS-0681: Dental Assistants: This series covers positions with duties to receive and prepare patients for dental treatment; to prepare materials and equipment for use by the dentist; to assist a dentist at chairside or bedside in the treatment of patients; to perform reversible intra-oral procedures under the supervision of the dentist; to perform dental radiography work; and to keep records of appointments, examinations, treatments and supplies.