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INDEPENDENT REGULATORY REVIEW COMMISSION
333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

October 12, 2000

Hanna Gruen, Chairperson
State Board of Occupational Therapy Education and Licensure
116 Pine Street
Harrisburg, PA 17105

Re: Regulation #16A-674 (IRRC #2136)
State Board of Occupational Therapy Education and Licensure
General Revisions

Dear Chairperson Gruen:

Enclosed are our Comments. They are also available on our website at www.irrc.state.pa.us.

Our Comments list objections and suggestions for consideration when you prepare the final version of this regulation. We have also specified the regulatory criteria which have not been met. These Comments are not a formal approval or disapproval of the proposed version of this regulation.

If you would like to discuss these Comments, please contact my office at 783-5417.

Sincerely,

Robert E. Nyce
Executive Director
wbg
Enclosure

cc: Honorable Mario J. Civera, Jr., Majority Chairman, House Professional Licensure Committee
Honorable William W. Rieger, Democratic Chair, House Professional Licensure Committee
Honorable Clarence D. Bell, Chairman,
Senate Consumer Protection & Professional Licensure Committee
Honorable Lisa M. Boscola, Minority Chairman,
Senate Consumer Protection & Professional Licensure Committee
Honorable Kim Pizzingrilli, Secretary of the Commonwealth
Dorothy Childress
Herbert Abramson
Joyce McKeever

Comments of the Independent Regulatory Review Commission

on

**State Board of Occupational Therapy Education and Licensure Regulation
No. 16A-674**

General Revisions

October 12, 2000

We submit for your consideration the following objections and recommendations regarding this regulation. Each objection or recommendation includes a reference to the criteria in the Regulatory Review Act (71 P.S. § 745.5a(h) and (i)) which have not been met. The State Board of Occupational Therapy Education and Licensure must respond to these Comments when it submits the final-form regulation. If the final-form regulation is not delivered by September 11, 2002, the regulation will be deemed withdrawn.

1. Section 42.24 Code of Ethics. – Reasonableness.

This section updates the regulation to reflect the 1994 American Occupational Therapy Association (AOTA) Code of Ethics. However, in April of this year, AOTA revised its Code of Ethics. The Board should revise the final-form regulation to reflect the 2000 AOTA Code of Ethics.