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5/11/2011

Dear Judith Pachter Schulder,

I am writing in response to the proposed rulemaking regarding continuing competency for Occupational Therapists in Pennsylvania. I have several thoughts/concerns to share with you.

The requirements are more stringent than what we as Occupational Therapists are required to complete for the National Board Certification (NBCOT). For instance, volunteer work in a related area is acceptable to NBCOT. The new proposed rules for competency (as I understand them) state that one must first do the volunteer work, then submit a request for it to be accepted, pay \$40 and then wait for a decision. Also, NBCOT accepts 100% of the required units per renewal for attending workshops, seminars, and workplace continuing education. The new proposed regulations for PA require at least two different areas to obtain the required units.

Therapists who work in the suburbs, or outside major cities, often do not have student programs in their facilities (due to shortage of staff), nor close access to colleges to take courses. I feel that therapists that work part-time, are raising families, or caring for elderly parents will find the monetary and time expenditures overwhelming. The criteria for maintaining a license in PA, according to this proposal, seems very heavily weighted in academia. Being an OTR for thirty six years and having worked continuously, I find this unfortunate. My first response to reading the document was to retire! And, I might add, that was what my boss (a few years younger) said as well. I love OT, but my household is not dependent on my income. I choose to work part-time because of my love for OT. In this climate of aging baby-boomers, and the shortage of therapists (I get calls for jobs at least five times a week every week) is it really smart to put this ruling in place and chance losing experienced therapists such as myself?

I did attend a POTA meeting regarding these guidelines. When I tried to pose the above questions/concerns, they were not answered. I wanted to take this opportunity to share with you what we therapists "out in the trenches" think about the ruling. I do want to say, though, that I am very much in favor of continuing education/competency requirements.

Thank you for your time and attention to this matter.

Respectfully submitted,

Amy Dale, OTR/L

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