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Form Letter Group 1 #3

Wallingford Nursing and Rehab  
Occupational Therapy Department  
115 S. Providence Rd  
Wallingford, Pa 19086

May 31, 2011

Judith Pachter Schulder  
Board Counsel  
Pennsylvania State Board of Occupational Therapy  
Education and Licensure  
P.O. Box 2649  
Harrisburg, PA 17105-2649

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IRRC  
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Dear Ms. Schulder,

This letter is in response to the proposed rulemaking of the State Board of Occupational Therapy Education and Licensure concerning continuing competency regulations. Our concern is regarding the requirement for six contact hours outside of continuing education.

As licensed Occupational Therapists in the state, we support and recognize the need to have guidelines for continued professional competence to assure the maintenance of knowledge and skill while providing the opportunity for lifelong professional learning. Our understanding of the proposed rulemaking states that on a biennial basis an occupational therapist will be required to complete a minimum of 24 contact hours. The proposed rule further specifies that of the 24 contact hours only 18 hours may be obtained through continuing education courses. The additional six hours must be obtained from mentorship, fieldwork supervision, professional writing activities, or presentation and instruction.

We strongly believe that these specificities will create obstacles to novice and experienced therapists.

- Therapists in some areas of the state may not have access to colleges and universities where they can enter academia. Heavily academic focused requirements may not meet the needs of all trained clinicians.
- Many centers do not take students due to limited staffing or staffing by prn therapists.
- Limited choices have negative impact on availability of practitioners threatening the leave of experienced therapists from the field.
- Additional time and financial demands may be a burden to a practitioner raising a family and/or caring for loved ones.

[Recipient Name]

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We urge you to reflect on these outlined points. The proposal sets up a significant risk of losing vital, experienced occupational therapists due to the restrictive impact of these changes and limits the assurance of occupational therapy to the consumer.

Please do not hesitate to contact us with questions or comments.

Thank you for your time and attention.

Sincerely,

*Heather Hall MOTR/L*

[Your Name]

*Mally Thomas, OTR/L*

*Janice L. McLaughlin, COTA/L*

*Rajesh Kumar H. Desai, OTR/L*

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