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110 West Logan St.
Philadelphia, PA. 19144

Judith Pachter Schulder Board Counsel
State Board of Occupational Therapy Education & Licensure
Harrisburg, PA. 17105-2649

Re: Proposed Continuing Competency Regulations for PA Occupational Therapists

I reject the Board's proposal for continued competency requirements.

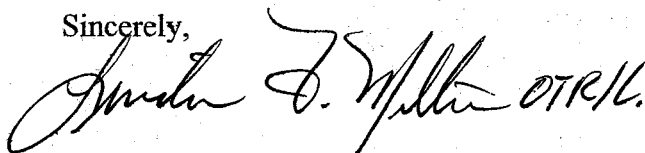
I agree we need to maintain and expand our professional knowledge and skills. I agree there should be a process where our growth as professionals is monitored. I am in compliance with the National Board for Certification in Occupational Therapy (NBCOT) requirements for maintenance of registration. However the State's current proposal to restrict the amount of educational credits used for maintaining licensure appear unreasonable.

The State Board of Occupational Therapy Education & Licensure threatens our license therefore our livelihood. The NBCOT requires Professional Development Units (PDUs). Practice areas are recognized and activities are accredited accordingly. The PA Board of Occupational Therapy Education and licensure does not appear to consider the diversity of our profession.

Is it necessary for us to differ from other professionals regarding retention of licensure? Perhaps we could accept continued education credits biennial like other professional accreditation governing bodies. Categorize fieldwork education, mentorship, article/journal reviews as options for credits equal to or greater than continuing education credits. Modify or adopt NBCOT's criteria of PDUs.

Occupational Therapy is a profession with diversity. The current proposal by the PA Board of Occupational Therapy Education & Licensure if passed would force us to go the extra mile and pay the extra cost to prove ourselves worthy as being called professionals. Please reconsider modifying or reject the proposal as it is currently written.

Sincerely,



Linda F. Miller OTR/L