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To Whom It May Concern:

My name is Kathleen and I have been an Occupational Therapist for 2 years. I thoroughly enjoy what I do for a living and am pleased to work in a state that is setting higher standards for their professionals.

After reading the "Proposed Rulemaking" document I have noted a few concerns. The majority of the Occupational therapists I know are members of the National Board of Certified Occupational Therapist Association, which already requires a specific number of CEUs to maintain a professional standard on the national level. If the proposed Pennsylvania rule requests CEUs over and above the national requirement; I foresee over the top expenses and increased strain on the OT community. The other concern I noted was the special focus on the six CEUs with mandatory focus on mentoring, students, editing, and writing ect.

The special six CEUs produce a new list of complications. Many sites, where OTs are employed, do not accommodate students or mentoring as a means of continuing competency which cancels the opportunity. As far as writing and editing, many OTs are not professional writers and have not been trained to edit professional documents.

It is unclear as to who we are to ask for Board approval for possible CEU opportunities. Many facilities where we work request educational series from the staff; if these opportunities were board approved it could make a substantial difference for those occupational therapists who are PRN, casual or who work in assisted living facilities. More ideas like the one I listed would assist those who are not afforded such generous opportunities for continuing competencies.

A clarification of the fee schedule would also be appreciated. As is appears now a \$120 fee is due for the new licensure. Again, cost is a major concern because of the varying degrees of salaries in each setting.

These are just a few concerns that were triggered from reading the future proposal. A clarification would be greatly appreciated as well as changes to assist lower income and casual therapists.

Thank you for you time,

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