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April 26, 2011

Judith Pachter Schulder, Board Counsel
State Board of Occupational Therapy Education and Licensure
PO Box 2649
Harrisburg, PA 17105-2649

Dear Ms Judith Pachter Schulder,

My name is Julie Kearney. I am a recent graduate from the University of Pittsburgh masters of occupational therapy program and currently working as an OTR/L in an assisted living setting. It has been brought to my attention that a new draft is currently under review by the Pennsylvania State Board of Occupational Therapy Education and Licensure in regards to Continuing Competency Requirements for all occupational therapists seeking licensure renewal which specifically states "Effective the first renewal period following publication (approximately 2014), all licensed occupational therapists (OTs) are required to complete a minimum of 24 contact hours in at least two acceptable continuing competency activities each biennium".

While I applaud the Board for addressing this issue, as requirements for continued competency are extremely important to the profession, I feel that is my obligation as a working occupational therapist to bring my concerns to the Board's attention so that the most appropriate and informed decision can be made concerning this matter.

It is my understanding that if the new requirements are put into effect, out of the 24 required contact hours only 18 of those contact hours can be obtained through continuing education courses and that the remaining 6 must come from mentorship, fieldwork supervision, professional writing activities, or presentation and instruction. As a recent graduate, I find these requirements particularly challenging as I am not yet ready to provide mentorship or fieldwork supervision. Clarification is needed as to whether or not credit would be given to new grads that are being mentored by a more established therapist.

I also question how it is that the activities mentioned above insure competency. A therapist could do lectures and publish an article but have no hands on experience applying what they have learned to actual patients. As a working fulltime therapist who has attended multiple continuing education courses I have always taken what I have learned from the course back to my setting and put it into practice when appropriate. I question how creating a presentation or publishing a paper make someone a more competent OT than another individual who has attended courses and is actively applying what they have learned on a daily basis. Clarification is necessary as to what is considered a peer reviewed and/or invited presentation. Would internal

presentations and in-services to fellow staff members be considered to meet the presentation requirement?

I feel that these requirements may add undue hardship to clinicians to maintain their licensure and could quite possibly affect the availability of practicing therapists. Without proper clarification and insight from practicing therapists these requirements may ultimately be detrimental to the profession which I love.

Sincerely,

A handwritten signature in black ink that reads "Julie M. Kearney, MOT, OTR/L". The signature is written in a cursive style with a large initial "J".

Julie M. Kearney, MOT, OTR/L