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April 28, 2011

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

Dear Ms. Pachter Schulder and Fellow Board Members:

RE: PROPOSED REGULATIONS FOR OCCUPATIONAL THERAPY EDUCATION AND LICENSURE

My name is Lori Glassbrenner and I have been practicing as an Occupational Therapist (OT) for more than ten years full time. I am writing to you today to share some of my concerns and questions regarding the regulations for Occupational Therapy Education and Licensure.

Foremost, I would like to share with you that I love my profession. I believe firmly in it and the need for clinicians to remain current with research and education, as well as providing support for each other and our customers in a multitude of ways. I also believe in being an advocate for Occupational Therapy at any and all levels. It is with this in mind that I write to you regarding the potential unfairness related to the aforementioned proposed guidelines.

One of my concerns is under the category of "Fieldwork Supervision", where it states that "3 contact hours per student up to 6 contact hours per biennium may be earned for serving as a supervisor for Level II Fieldwork". First, this is an investment and time commitment that is, in my opinion, MUCH more worthy than 3 contact hours per student. This is not only to be considered a time commitment, but should primarily be a dedication and investment to our practice and our future as a profession. Secondly and despite my disagreement with the proposed allotted contact hours, how will this encourage current clinicians to accept students under Fieldwork Supervision if they are limited to not only the number of contact hours they can obtain PER STUDENT, but also PER BIENNIUM? This should be a general occurrence of our practice that is ENCOURAGED, not LIMITED by way of reward by our governing body. This should be noted similarly with respect to the "Mentorship" category.

Additionally, who or what is it that determines "continued competency" for daily practice as an Occupational Therapist based on a specific requirement (or limitation in some circumstances) in each of the given fields of "acceptable activities"? Does the Board recognize that the OT who chooses to complete most of her/his activities in writing and presentations is more or less competent than the person who chooses to spend their time

mentoring and accepting Fieldwork I and II students but is not rewarded for such an effort as generously? While it is kind of the Board to allow many options for continued competency activities and each clinician may choose freely and actively which to participate in, I feel that a review of the weightiness of each category may benefit ALL OT's in such that they may each contribute to their professionalism in an area of interest and be considered competent nonetheless. In other words, the Fieldwork Supervisor is EQUALLY as competent as the writer/presenter (both of whom completed educational courses as well), just in a different realm of practice.

I have further concerns for those clinicians that maybe unable to comply with such regulations due to part-time work status or other limiting circumstances. Also, are there graces given to new graduates for a certain time period?

In summary, while I respect the Board and their attempts at proposing guidelines for maintaining the ability to practice under state licensure, I urge you to review some of the above details in addition to the potential undue hardship this may cause not only the current but future OT/OTA practitioners in the state of Pennsylvania. While we (OT practitioners, in general) each have individual circumstances and understand the need for continued competency amongst ourselves and our peers to best serve our customers, I feel that some areas within the proposal could use further clarification.

I commend and thank you on your efforts with governing our profession and trust that you will make these regulations FAIR based on the feedback and information that you receive from the currently licensed individuals and others who are relevant. We continue to be scrutinized and regulated by our government and by health care in general, please help us to be the SUCCESSFUL clinicians that we all strive to be in providing the best possible care to our customers.

Thank you for your time and consideration to this matter.

Sincerely,

*Lori A. Glassbrenner, MOT, OTR/L*

Lori A. Glassbrenner, MOT, OTR/L  
Occupational Therapist/Program Manager