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Dear Judith Pachter Schulder,

2011 MAY 12 P 3:04

I am writing in response to the proposed rulemaking regarding the continuing competency for Occupational Therapists in Pennsylvania. I have several thoughts and concerns to share with you.

The proposed requirements are more stringent than what we as Occupational Therapists are required to complete for the National Board Certification (NBCOT). The NBCOT accepts 100% of the required units per renewal for attending workshops, seminars, and workplace continuing education. The new proposed regulations for PA require at least two different areas to obtain the required units.

Therapists who work in the suburbs, or outside major cities, often do not have student programs in their facilities (due to staff shortages), nor close access to colleges to take courses. It seems the criteria for maintaining a license in PA, according to the proposal, is heavily weighted in academia. I feel that therapists that work fulltime, as well as raising a family and/or caring for elderly parents, will find the monetary and time expenditures overwhelming. I have worked as an OTR for thirty years and have always found it fulfilling. I find it unfortunate that by putting this ruling in place we may be losing valuable, experienced therapists. In this climate of aging baby boomers and the shortage of therapists, is it wise to put this ruling in place and chance losing experienced therapists such as me and several of my colleagues?

I am in favor of continuing education/competency requirements but I don't want them to be so restrictive that we lose experienced Occupational Therapists in the process.

Thank you for your time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink that reads "Cindy Kauffman OTR/L". The signature is fluid and cursive, with the last name "Kauffman" being the most prominent part.

Cindy Kauffman, OTR/L
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