

Schulder, Judith

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From: ST, OCCUPATIONAL
Sent: Monday, May 09, 2011 9:03 AM
To: Schulder, Judith
Subject: FW: Comments changes regarding continued competency

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-----Original Message-----

From: Dubuar, Nancy [<mailto:Nancy.Dubuar@GenesisHCC.com>]
Sent: Monday, May 09, 2011 8:57 AM
To: ST, OCCUPATIONAL
Subject: Comments changes regarding continued competency

May 7, 2011

Judith Pachter Schulder

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

Dear Ms. Pachter Schulder,

I am an Occupational Therapist who is licensed to practice in Pennsylvania. I am writing to show my support for our OTR's in regards to the proposed OT Guidelines for Continuing Competency Requirements to maintain licensure. My concern is regarding the requirement for six contact hours outside of continuing education.

I support the need for continued competency for occupational therapists in the commonwealth of Pennsylvania. I understand that when polled the occupational therapists reported they did not want to have an exam be required for competency. I also agree that CEUs alone do not assure competence. However, I think there is a whole category of competency that is not included in the proposed regulations that should be recognized: AOTA Board Certification (Gerontology, Mental Health, Pediatrics) and AOTA Specialty Certification (Driving and Community Mobility; Environmental Modifications; Feeding, Eating and Swallowing; and Low Vision) and specialized certification from accredited courses such as Lymphadema and Physical Agent Modalities.

I believe that if a practitioner has completed these certifications in the previous two years of license cycle that should be sufficient to meet the standard of competency. Accredited courses have a higher standard and cost than approved CEU courses. I completed my Physical Agent Modalities course through Saginaw University. There was significant reading, online instruction and tests for every module, plus two 8 hour days of in class training with the modalities and a final exam. Once the course work was complete, I had to complete 20 treatments using most of the modalities available under supervision of a physical therapist or occupational therapist already certified in PAMS. This class was 45 CEUs plus the supervised treatments.

I believe it is a hardship to not recognize these accredited programs and certifications as an additional category for the remaining 6 hours above the 18 CEUs allowed under the proposed regulations. These certifications are expensive, and require a large time commitment. They require a higher standard of education than an approved CEU course. Practitioners should be encouraged to seek these credentials in spite of the high cost and huge time commitment. Recognizing these programs as satisfying the last 6 hours of competence would do promote seeking these certifications and improve the quality of occupational therapy treatment. The vigorous standards of these accredited certifications are valuable safeguards to the citizens of Pennsylvania that practitioners are competent in the area of certification.

Sincerely,

Nancy Dubuar, MOT, OTR/L, CPAMS

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