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To the PA Occupational Therapy Licensure Board,

I have read the proposed recommendations for continued competency for Occupational Therapist in the state of Pennsylvania and recognize the work and time that went into preparing such a document. I first want to congratulate the current licensure board, and prior board members, who have worked so diligently to craft such a document. I am also a member of NBCOT and find that the Pennsylvania competency appears to be much more restrictive than those requirements set by our National Board. I am unclear as to why the state of Pennsylvania would not consider the same areas as NBCOT as demonstrating competency, to that end, I have some questions regarding the proposed regulations.

1. For therapists currently in part time or casual PRN positions and as such do not have access to some of the options listed how will the competency regulations affect them? For example, I know an OT who currently works 1 or 2 Saturdays per month. I am also aware of an OT who is planning to take time off as she returns to school and another who is medically unable to work at this time.
2. I am also interested in how the following scenario would work, if I complete a course for a specialty, example Sensory Integration or a specialty certification, that requires extensive course work and testing to determine competency, could this be an additional choice for demonstrating competency? It would seem that a process that requires testing to determine competency would be weighted heavier than simply attending a 1 day course.
3. For OTs who are in the academic field, how will teaching class be classified? Will these therapists be able to take credit every year for teaching the same courses or will these courses not count toward the competency requirements? In that same vein, if I was presenting at POTA conference and submitted the same presentation for another venue, do both presentations count? I am assuming that the venues are both approved provider venues
4. For participation either elected or appointed positions within the Occupational Therapy profession, say as a POTA board member, member of the licensure board etc. How can these activities be considered toward competency?
5. For an OT who is working and going to school, will the school course work be counted toward the competency?
6. What about OTs who are involved in research projects? Either in data collection or development of the research. How can these activities be counted toward competency?

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7. For a group presentation or group article, how many OTs can co-present or co-author and still get credit?
8. If my company applies and receives approved provider status, does this mean that every presentation, with learning objectives, is counted? And if I do multiple presentations of the same topic does each one count separately? For example, body mechanics presentation to the Nursing staff at facility as a mandatory yearly in-service provided 5 times through a week time period.
9. If I participate in a health fair or other type of community project, how could this involvement be used to demonstrate competency?
10. Involvement with another organization, such as Arthritis foundation, CP, etc. Is there any way to get credit for volunteering with these type of organizations?

Thank you for your assistance with these questions. I hope that the Board will give consideration to these additional areas, that I believe can also be used to demonstrate competency in the field of Occupational Therapy.

Sincerely,

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