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

**RECEIVED  
IRRC**

**2011 JUN -9 P 1: 22**

**Re: Proposed rule to adopt 42.51 – 42.58 Relating to Continued Competency**

**As a licensed Occupational Therapist in Pennsylvania, I support and recognize the need to have guidelines for continued competence to assure the maintenance of knowledge and skill while providing Occupational Therapy.**

**Several years ago, The National Board for Certification in Occupational Therapy, Inc. (NBCOT), had adopted competency requirements which I have continued to fulfill. In review of the Board's options available for continued competency, they appear restrictive and limited when compared to NBCOT. Some of the options may not be readily available to many therapist including myself. I am asking for you to consider additional opportunities similar to NBCOT.**

**I appreciate the consideration of the Pennsylvania Board to increase the variety of competency activities .**

**Thank you for your time and consideration,**

**Charlotte Moats, OTR/L  
License No. OC003742L  
NBCOT Certification 991168.**