

2892

Devon Manor
Occupational Therapy Department
235 West Lancaster Avenue
Devon, PA 19333
May 31, 2011

RECEIVED
IRRC

2011 JUN -9 P 1:25

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

Dear Ms. Schulder,

This letter is in response to the proposed rulemaking of the State Board of Occupational Therapy Education and Licensure concerning continuing competency regulations. Our concern is regarding the requirement for six contact hours outside of continuing education.

As licensed Occupational Therapists in the state, we support and recognize the need to have guidelines for continued professional competence to assure the maintenance of knowledge and skill while providing the opportunity for lifelong professional learning. Our understanding of the proposed rulemaking states that on a biennial basis an occupational therapist will be required to complete a minimum of 24 contact hours. The proposed rule further specifies that of the 24 contact hours only 18 hours may be obtained through continuing education courses. The additional six hours must be obtained from mentorship, fieldwork supervision, professional writing activities, or presentation and instruction.

We strongly believe that these specificities will create obstacles to novice and experienced therapists.

- Therapists in some areas of the state may not have access to colleges and universities where they can enter academia. Heavily academic focused requirements may not meet the needs of all trained clinicians.
- Many centers do not take students due to limited staffing or staffing by prn therapists.
- Limited choices have negative impact on availability of practitioners threatening the leave of experienced therapists from the field.
- Additional time and financial demands may be a burden to a practitioner raising a family and/or caring for loved ones.

Judith Pachter Schulder
May 31, 2011
Page 2

We urge you to reflect on these outlined points. The proposal sets up a significant risk of losing vital, experienced occupational therapists due to the restrictive impact of these changes and limits the assurance of occupational therapy to the consumer.

Please do not hesitate to contact us with questions or comments.

Thank you for your time and attention.

Sincerely,

Jennifer Kozemko, OTR/L
Assistant Director of Rehab.

Jodi Kozlevcar, M.S., OTR/L
Staff Occupational Therapist

Ellen Kremer, M.S., OTR/L
Staff Occupational Therapist

Patricia Hunter, OTR/L
Staff Occupational Therapist

Mini Matthew, M.S., OTR/L
Staff Occupational Therapist

2892

Pennsylvania State Board of Occupational Therapy

Education and Licensure

P.O. Box 2649

Harrisburg, PA 17105-2649

RECEIVED
IRRC

2011 JUN -9 P 1:29

Dear Ms. Schulder,

This letter is in response to the proposed rulemaking of the State Board of Occupational Therapy Education and Licensure concerning continuing competency regulations. Our concern is regarding the requirement for six contact hours outside of continuing education.

As licensed Occupational Therapists in the state, we support and recognize the need to have guidelines for continued professional competence to assure the maintenance of knowledge and skill while providing the opportunity for lifelong professional learning. Our understanding of the proposed rulemaking states that on a biennial basis an occupational therapist will be required to complete a minimum of 24 contact hours. The proposed rule further specifies that of the 24 contact hours only 18 hours may be obtained through continuing education courses. The additional six hours must be obtained from mentorship, fieldwork supervision, professional writing activities, or presentation and instruction.

We strongly believe that these specificities will create obstacles to novice and experienced therapists.

§ Therapists in some areas of the state may not have access to colleges and universities where they can enter academia. Heavily academic focused requirements may not meet the needs of all trained clinicians.

§ Many centers do not take students due to limited staffing or staffing by prn therapists.

§ Limited choices have negative impact on availability of practitioners threatening the leave of experienced therapists from the field.

§ Additional time and financial demands may be a burden to a practitioner raising a family and/or caring for loved ones.

We urge you to reflect on these outlined points. The proposal sets up a significant risk of losing vital, experienced occupational therapists due to the restrictive impact of these changes and limits the assurance of occupational therapy to the consumer.

Please do not hesitate to contact us with questions or comments.

Thank you for your time and attention.

Sincerely,

Jennifer Kozemko, OTR/L

Assistant Director of Rehabilitation

610-688-8080

Jodi Kozlevcar, M.S., OTR/L
Staff Occupational Therapist

Ellen Kremer, M.S., OTR/L
Staff Occupational Therapist

Patricia Hunter, OTR/L
Staff Occupational Therapist

Mini Matthew, M.S., OTR/L
Staff Occupational Therapist

The information contained in this transmission is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material.
If you are not the intended recipient of this information, do not review, retransmit, disclose, disseminate, use, or take any action in reliance upon, this information. If you received this transmission in error, please contact the sender, destroy all printed copies, and delete the material from all computers.
=====

2892

Schulder, Judith

From: Schulder, Judith
Sent: Tuesday, June 07, 2011 1:28 PM
To: '586REHAB-OT@hcr-manorcare.com'
Cc: ST, OCCUPATIONAL
Subject: RE: Continued Competency Regulations

RECEIVED
IRRC

2011 JUN -9 P 1:24

The State Board of Occupational Therapy is in receipt of your comment on the above regulation. Please be advised that since it has arrived after the official public comment period ended, it will not be recognized by name in the Preamble. Nonetheless, the information which you convey will be addressed. Thanks for your interest in the practice of occupational therapy.

Judith Pachter Schulder | Counsel State Board of Occupational Therapy Office of General Counsel |
Department of State Commonwealth of Pennsylvania
2601 North Third Street | Harrisburg, PA 17110
Phone: 717.783.7200 | Fax: 717.787.0251 PRIVILEGED AND CONFIDENTIAL ATTORNEY-CLIENT
COMMUNICATION

ATTORNEY WORK PRODUCT

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

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

From: ST, OCCUPATIONAL
Sent: Friday, June 03, 2011 9:15 AM
To: Schulder, Judith
Subject: FW:

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

From: DevonManor586-REHAB-OT [<mailto:586REHAB-OT@hcr-manorcare.com>]
Sent: Thursday, June 02, 2011 2:43 PM
To: ST, OCCUPATIONAL
Subject:

Devon Manor

Occupational Therapy Department

235 West Lancaster Avenue

Devon, PA 19333

May 31, 2011

Judith Pachter Schulder

Board Counsel