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Yeadon, Pennsylvania 19050  
(610) 626-8065  
(610) 623-8009 Fax

2892

Judith Pachter Schuder  
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 1:23

June 3, 2011

**HCR·ManorCare**

 **At Mercy Fitzgerald**  
SM

*Nursing & Rehab  
MedBridge Unit*

Dear Ms. Schuder,

We are writing to you in response to the proposed changes to the State Board of Occupational Therapy Licensure continuing competency regulation requirements. Our understanding is that Pennsylvania Occupational Therapists will be required to complete 24 contact hours. The proposed rule indicates 18 of these hours may be obtained through continuing education opportunities. Our specific concern is in regards to the six (6) contact hours required outside of continuing education opportunities.

Although we acknowledge the need to have specific requirements to maintain clinical competency and continued professional growth, we feel the additional 6 contact hours which must be obtained via academic methodology such as mentorship, fieldwork supervision, professional writing, presentations or instruction may present a hardship or significant barrier for successful completion for many of our outstanding Occupational Therapists throughout the state.

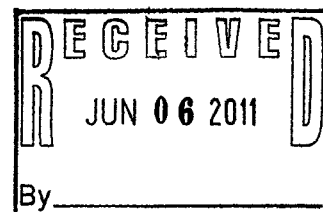
Many therapists may not have access to the necessary institutions which would be required to meet your stated criteria due to their current life situation. These stringent requirements could have a further negative impact on what is already a current shortage of Occupational Therapists.

Although we strongly support the need for continued competency requirements in order to maintain the highest standards, we urge you to reconsider such strict requirements on these six (6) additional hours.

Thank you for your time and attention.

Respectfully submitted,

*Megan M Ryan MOT, OTR/L, DOR*



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Pottstown Manor Care  
Occupational Therapy Department  
724 North Charlotte Street  
Pottstown PA 19464  
June 1, 2011

RECEIVED  
IRRC

2011 JUN -9 P 1:24

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,

We are writing to you in response to the proposed changes to the State Board of Occupational Therapy Licensure continuing competency regulation requirements. Our understanding is that Pennsylvania Occupational Therapists will be required to complete 24 contact hours. The proposed rule indicates 18 of these hours may be obtained through continuing education opportunities. Our specific concern is in regards to the six (6) contact hours required outside of continuing education opportunities.

Although we acknowledge the need to have specific requirements to maintain clinical competency and continued professional growth, we feel the additional 6 contact hours which must be obtained via academic methodology such as mentorship, fieldwork supervision, professional writing, presentations or instruction may present a hardship or significant barrier for successful completion for many of our outstanding Occupational Therapists throughout the state.

Many therapists may not have access to the necessary institutions which would be required to meet your stated criteria due to their current life situation. These stringent requirements could have a further negative impact on what is already a current shortage of Occupational Therapists.

Although we strongly support the need for continued competency requirements in order to maintain the highest standards, we urge you to reconsider such strict requirements on these six (6) additional hours.

Thank you for your consideration.

Respectfully submitted,



Robert J. DeWald OTR/L



Emily C. Kramer OTR/L



Charlene A. Senico OTR/L