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ManorCare of Bethlehem
Outpatient Occupational Therapy Department
2029 Westgate Drive
Bethlehem, PA 18017
June 3, 2011

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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

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 and part-time educator at the University level, I support and recognize the need to have guidelines for continued professional competence to ensure that those who provide services maintain the highest level of knowledge and skill. My 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.

I 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 and many universities already have their quota of adjunct faculty and speakers. Having this option also would be difficult for an entry level clinician as they, themselves, are still learning.
- Many centers do not take students due to Medicare guidelines. Working in the outpatient sector of our profession, Medicare B does not allow students to participate in the treatment of a resident thus reducing our ability to take students, especially level II students.
- Having limited choices may ultimately have a negative impact on the profession. In many parts of Pennsylvania there is already a shortage of OTR's and COTA's. If this regulation were to go into effect, there is a great possibility that more

June 3, 2011

Page 2

clincians will leave the field. This will result in non-occupational therapy practitioners performing activities which have traditionally been in the occupational therapy practice frame work.

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,

A handwritten signature in black ink that reads "Jason J. Meixsell". The signature is written in a cursive, flowing style.

Jason J. Meixsell, M.S., OTR/L