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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

Re: Proposed rule to adopt 42.51-42.58 Relating to Continued Competency

This letter is in response to the proposed rulemaking of the State Board of Occupational Therapy Education and Licensure (the "Board") concerning continuing competency regulations.

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. In our review of the options available, we feel some opportunities exist that should be considered:

- The proposed continued competency regulations appear to be restrictive and limited when compared to those requirements presented by the National Board (NBCOT). If taken exactly as written, all therapists would be required to take a Level II OT or OTA fieldwork student, or professionally write a publication of a peer-reviewed or non peer-reviewed book, chapter, article, or teach an academic approved course or be an officer of the association or provide mentorship. These are options that may not be readily available to many therapists. There is a component of our workforce that practices Occupational Therapy on a PRN or part time basis due to raising a family, and/or caring for loved ones. These additional time demands may not be reasonable for those individuals. Others do not work close to major cities or universities where OT programs are

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offered. While we are in favor of lifelong professional learning, with only 6 options proposed by the Pennsylvania Board, we feel there is a significant risk of losing vital, experienced clinicians in PA due to the restrictive nature of the proposed regulation. Additionally, this may have a negative impact on PA consumer access to both Occupational Therapy services and to the profession at large.

- We are supportive of the American Occupational Therapy Association's (AOTA) position that the PA Board recognize additional activities for which continuing competency hours could be awarded including independent study, development of or participation in a research project, development of a grant proposal, and professional meetings. Many of these additional activities would allow for self direction and additional flexibility for the current work force to meet competency standards.

We appreciate the consideration of the Pennsylvania Board to increase the variety of competency activities and thank you for your time and consideration regarding our suggestions. If we can provide any further information or you prefer to discuss these recommendations please feel free to contact anyone of us.

Sincerely,

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