

2892

June 3, 2011

RECEIVED  
IRRC

Judith Pachter Schulder  
Board Counsel

2011 JUN -9 P 1:25

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 Continue Competency

Dear Ms. Pachter Schulder,

I am writing in response to the proposed rulemaking of the State Board of Occupational Therapy Education and Licensure concerning continuing competency regulations. I have recently read the proposed changes and do not believe that these changes will improve the practice of occupation therapy in our state. As the Director of Rehab at a Subacute/Skilled Nursing Facility, I am highly concerned about impact that these regulations will have on prospective students who are deciding whether to pursue a career as an occupational therapist as well as those already in the field.

While I am in favor of lifelong professional learning, I believe that that the proposed regulations are restrictive and limiting when compared to those requirements presented by the National Board Certification (NBCOT). The NBCOT accepts 100% of the required unites per renewal for attending workshops, seminars, and workplace continuing education. The new proposed regulations for Pennsylvania will require at least two different areas to obtain required units. It appears as though the criteria for maintaining licensure in PA is heavily weighted in academia and does not take into account the barriers already encountered by therapist on a daily basis. The new proposed regulatory changes will only seek to add more stress, financial burdens and time restraints rather than produce more qualified and competent occupational therapist in the profession.

I appreciate your time and consideration in this matter and I respectfully request that the Board consider reducing the continuing education competency requirements and expand the options available in order for occupational therapist to fulfill them. If you have any questions regarding my comments, I can be contacted at 610-626-7700.

Sincerely,

Melissa Merced, MS/CCC-SLP  
Director of Rehab Services  
HCR Manor Care – Yeadon

**From:** ST, OCCUPATIONAL  
**Sent:** Monday, June 06, 2011 2:44 PM  
**To:** Schulder, Judith  
**Subject:** FW: Proposed Rule to Adopt 42.51-42.58  
**Attachments:** OT Letter.doc

**From:** Yeadon572-REHAB [<mailto:572REHABDOR@hcr-manorcare.com>]  
**Sent:** Friday, June 03, 2011 1:36 PM  
**To:** ST, OCCUPATIONAL  
**Subject:** Proposed Rule to Adopt 42.51-42.58

<<OT Letter.doc>>

**Melissa Merced, MS/CCC-SLP**

**Director of Rehab -**

**HCR Manorcare**

**14 Lincoln Avenue**

**Yeadon, PA 19050**

**(610) 626-7700 x212**

-----  
-  
< CONFIDENTIALITY NOTICE >

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.

=====

=