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HCR-ManorCare
3430 Huntingdon Pike
Huntingdon Valley, PA 19006
June2, 2011

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

Re: Proposed rule to adopt 42.51-
41.58 relating to continued
competency

Dear Ms. Pachter Schulder:

As a licensed Occupational Therapist and a Director of Rehabilitation in Pennsylvania we support and recognize the need to have guidelines for continued professional competence to assure the maintenance of current knowledge and skill while providing the opportunity for lifelong professional learning. However we find there are several additional considerations that should be examined:

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 offered. While we are in favor of lifelong professional learning, with only six options proposed by the Pennsylvania Board, we feel there is a significant risk of losing vital, experienced clinicians in our state due to the restrictive nature of the proposed regulation.

It is entirely possible that this proposal may be viewed by many as age discriminatory since it significantly favors those of mid-age in regard to chronological as well as professional "age." the narrow categories would be far more accessible to those who have been out of a professional program several years and able to form the necessary alliances for publication or academic opportunities than for those recently graduated or those older clinicians who have grown away from their academic peers while providing very needed services, especially in remote and under served areas.

We are supportive of the American Occupational Therapy Association's (AOTA) position that the Pennsylvania 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 entire current workforce 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 regarding our suggestions. If further any degree of discussion would help clarify our position please feel free to contact us.

Respectfully,

Suzanne T Marchei, OTR/L License No. OC004169L


Carolann M. Steed, PT, Phd. Director of Rehabilitation

