

King of Prussia Manor Care
Occupational Therapy Department
600 West Valley Forge Road
King of Prussia, PA 19406
June 2, 2011

RECEIVED
IRRC

2011 JUN 13 A 9 50

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, 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. Our 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.

We 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. Heavily academic focused requirements may not meet the needs of all trained clinicians.
- Many centers do not take students due to limited staffing or staffing by prn therapists.
- Limited choices have negative impact on availability of practitioners threatening the leave of experienced therapists from the field.
- Additional time and financial demands may be a burden to a practitioner raising a family and/or caring for loved ones.

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,

Joan L. Kerpel OTR/L

Kim R. Ly OTR/L

Wendy W. Fox OTR/L

Mary Muzew COA/C

Deborah Padman COA/C