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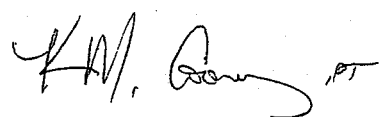
State Board of Physical Therapy
P.O. Box 2649
Harrisburg, PA 17105-2649

Dear State Board of Physical Therapy:

In response to the proposed rulemakings, in specific proposed 40.67 (continuing education), I am opposed. We are not all functioning as private practitioners. Many of us are specialized; I am involved in motion analysis in a pediatric orthopaedic setting. With my experience, I am typically the person performing the education. Attending "courses" has been a joke, with my knowledge most often exceeding those providing the education. Proposed 40.68 is ambiguous and confusing. A lot of words sound good, but actual, concrete descriptors of ways to accomplish the proposed 15 CEUs/Year, beyond costly and timely course work, are nowhere to be found.

I view these proposed regulations as excessive and potentially expensive for the typical, hospital-based therapist. While I fully understand the State's desire to provide for the best possible healthcare, this further causes a burden on the ever increasing healthcare costs. ~~Hospital systems are already reducing education expenditures, and the costs the practitioners will have to assume are not being balanced with salary increases.~~ Therefore, I certainly hope the State considers the "practical" ramifications these changes will have on our profession at ALL levels (beyond the narrow scope of private practitioners).

Sincerely,



Kevin M. Cooney, PT

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