

10-17-2011

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Department of State

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To Whom it may Concern:

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I would like to provide comment on the recent posting of the Act 38 revisions. Regarding section 40.11, I do not think there should be another organization other than CAPTE that would be considered for appropriate license application for a graduate in the United States. The manner in which is stated in the proposed changes reads to me as there may be another accrediting body other than CAPTE and other than those for foreign-educated. Also, I think using the term "internationally trained" rather than foreign-educated seems to be more inclusive language.

Regarding section 40.67, I am concerned about needing a stamp or specific certificate for attending each portion of approved continuing education. Recently I attended an APTA conference in June and was informed that APTA does not provide individual stamps or attendance certificates other than global registration confirmation. I realize that I have my registration confirmed and I believe this should suffice for attendance at conferences and courses. I do not believe other professionals such as lawyers or MD's have to have certificates to prove they were in attendance at specific segments of a conference. While I understand the potential for abuse of this system, that can be done with certificates as well and feel proof of attendance at the conference in addition to professional behavior should suffice for State Board review.

While I very much appreciate your inclusion of clinical competence, I am concerned that the tool being advocated has been created by the Federation and not really intended for the purpose as described in the Act revisions. In creating the tool, approving the tool and then having to purchase the same tool from the state board using this as approved contact hours, it would seem this system has great potential for conflict of interest. As stated, the avenue of another association or company does not have the opportunity to create and offer a clinical competence tool for public use.

Thank you for your consideration and I look forward to the final publication. Thank you for your hard work and attention to the details in our Practice Act in the Commonwealth.

Sincerely,

Colleen Chancler, PT, MHS

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